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Mariyana T. Spyropoulos
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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

JOHN DOE 61,)
)
Plaintiff,)
)
v.)
)
CATHOLIC BISHOP OF CHICAGO,)
A corporation sole, a/k/a the ROMAN)
CATHOLIC ARCHDIOCESE OF)
CHICAGO,)
)
Defendant.)

Case No. 2026L012251

PLAINTIFF DEMANDS TRIAL BY JURY

COMPLAINT AT LAW

NOW COMES the Plaintiff, JOHN DOE 61, by and through his attorneys, HART MCLAUGHLIN & ELDRIDGE, LLC, and hereby makes this Complaint against the Defendant, CATHOLIC BISHOP OF CHICAGO, a corporation sole, commonly known as the ROMAN CATHOLIC ARCHDIOCESE OF CHICAGO (hereinafter, the “Archdiocese of Chicago” or the “Archdiocese”), and pleading at times hypothetically or in the alternative, support the Complaint as follows:

SUMMARY OF THIS ACTION

1. This action is brought against the Archdiocese of Chicago on behalf of one of the likely hundreds of victims of child sexual abuse committed by priests assigned to the Holy Angels Parish between 1969 and 2002, particularly Father George Clements (“Fr. George Clements,” “Fr. Clements,” “George Clements,” or “Clements”), Father Paul (“Fr. Paul Smith,” “Fr. Smith,” “Paul Smith,” or “Smith”), Father John Calicott (“Fr. John Calicott,” “Fr. Calicott,” “John Calicott,” or “Calicott”), and Father Kenneth Brigham (“Fr. Kenneth Brigham,” “Fr. Brigham,” “Kenneth Brigham,” or “Brigham”).

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2. The Archdiocese of Chicago's 1969 decision to appoint Fr. George Clements pastor of Holy Angels Parish, which included the largest grammar school in the Archdiocese of Chicago and reportedly the largest predominantly Black Catholic school in the nation, commenced a decades-long tragedy of rampant child sex abuse there.

3. Within that wave was Fr. John Calicott, who received his first pastorship assignment at Holy Angels upon Fr. Clements's retirement in 1991, and was perceived by many to be Clements's natural successor as leader of the Black apostolate. Even the Archbishop of Chicago at the time, Cardinal Joseph Bernardin ("Cardinal Bernardin," or "Bernardine"), recognized Fr. John Calicott as a candidate to one day be elevated to bishop.

4. In 1994 Fr. Calicott was withdrawn from Holy Angels due to allegations of child sexual abuse that had been known by the Archdiocese for over a year, had been known by other Archdiocesan priests for over a decade, and were unanimously deemed credible within the Archdiocese.

5. Although formal procedures had recently been ratified and a theoretically independent "Professional Fitness Review Board" established to provide recommendations to Archbishop Joseph Bernardin ("Cardinal Bernardin") with respect to allegations of child sexual abuse by clergy members, the entire process was maladministered and fixed in Calicott's favor from its inception.

6. Calicott rallied a campaign of dissent charging Cardinal Bernardin with racism and railing against the new process, which was hardly developed. In a calculated maneuver, Calicott was sent to a church-sponsored psychiatric facility to be reviewed by a hand-selected "expert" to provide the pre-ordained opinions that Calicott "does not pose a significant risk to children" and should be returned to parish ministry.

7. For over a year the Archdiocese bent over backwards to accommodate Calicott, whose behavior throughout only served to confirm his unfitness for pastorship. In the face of resistance from the Archdiocese of Chicago's theoretically-independent Professional Fitness Review Board, Cardinal Bernardin ultimately pressured the Board into recommending Calicott's reinstatement in 1995 on the conditions that he would be actively monitored and that he would be prohibited from being alone with minors.

8. Calicott openly violated these conditions and continued his sexual exploitation immediately upon his reinstallation at Holy Angels, substantially aided by the fact that his designated on-site "monitor," Fr. Robert "Bob" Miller ("Fr. Bob Miller"), was openly indignant about Fr. Calicott's restrictions, hostile to his own responsibility to enforce them, and willing to covertly facilitate Calicott's continued leadership of the Boy Scout troop.

9. The Archdiocese did not take any meaningful action until 2002, following the sexual abuse scandal generated by the *Boston Globe's* expose series and the corresponding enactment of reforms occasioned by the U.S. Conference of Catholic Bishops in response thereto. The most prominent and controversial reform was an unqualified and universal rule that any Catholic priest deemed to have been credibly accused of child sex abuse could not return to any form of active ministry, not merely *parish* ministry.

10. The retroactive application of this rule meant that Fr. Calicott was immediately subject to mandatory withdrawal, and when the Archdiocese notified Calicott of this, he did not go quietly or promptly. And even when he did formally depart Holy Angels, non-existent supervision at his designated residence in Mundelein and an open and very public invitation from Fr. Bob Miller meant that Fr. Calicott was able to both return to and effectively reside at Holy Angels for at least another year and a half.

11. Given its knowledge of Fr. John Calicott's propensity to sexually abuse children and defy restrictions imposed upon him, the Archdiocese's decision to reinstate Calicott as pastor at Holy Angels in 1995 was indefensible and most definitely negligent.

12. By failing to correct that error and renewing Fr. Calicott's pastorship at Holy Angels, in the face of profound evidence of Calicott's unrepentant failure to adhere to the terms of his protocol and his on-site monitor's vehement hostility to that role, the Archdiocese of Chicago was at best deliberately indifferent to Calicott's many victims.

13. When an organization like the Archdiocese of Chicago has a duty to protect children from sexual abuse, discriminatory indifference to victims based on race is a form of malice.

14. Due to its utterly indifferent, outrageous, willful and wanton, and malicious failure to supervise or intervene against John Calicott, the Archdiocese of Chicago effectively condoned and caused catastrophic physical and psychological trauma to be inflicted upon at least several dozen children.

15. Plaintiff prays for judgment against the Archdiocese of Chicago for some of the immense harm it caused by doing so.

GENERAL ALLEGATIONS

THE ROMAN CATHOLIC CHURCH AND THE ARCHDIOCESE OF CHICAGO

16. The Roman Catholic Church is a Christian religious organization that, for over a thousand years, has claimed to be the sole legitimate successor of religious doctrine and authority bestowed by Jesus Christ, who is generally believed by Christians worldwide to have been the divine and immaculately conceived son of an omnipotent god.

17. In much of the Western world the Roman Catholic Church as an institution served as the predominant social structure for centuries, and to date claims more than one billion followers.

18. The organization of the Roman Catholic Church is headed by the Pope, who is popularly elected by Cardinals worldwide and regarded by Catholics as the divine successor to St. Peter, who governs from St. Peter's Basilica in Vatican City – a self-governed sovereign enclaved within Rome, Italy.

19. Throughout the world, Roman Catholicism is administered by bishops who are selected by the Pope to manage the affairs of nearly 3,500 jurisdictional dioceses and archdioceses across the globe.

20. Within the dioceses and archdioceses themselves, the ultimate responsibility and authority for managing their internal affairs – including the management of local parishes and property, the recruitment, training, ordination, and assignment of diocesan priests, and the operation and supervision of Catholic schools – rests with the appointed bishop or archbishop, as the case may be.

21. For many centuries, an unwavering tenet of Roman Catholicism has been its commitment to the celibacy of its diocesan priests. Indeed, for much of its history sexual activity was regarded as inherently impure even amongst the laity and justified only in service of procreation. Because Catholic priests were expected to devote themselves wholly to religious affairs, even the “act” of conceiving of sexual matters was strictly forbidden.

22. Notwithstanding the clarity and consistency of these principles, however, Catholic priests have demonstrated a long-standing and continuous history of failing to adhere to their oaths of celibacy.

23. Sexual activity by Catholic priests of heterosexual, homosexual, and pedophilic varieties was known at all relevant times to have been widespread.

24. To be sure, throughout the centuries an astounding amount of authoritative, Catholic ink has been spilled regulating and setting forth damning punishments for the sexual activity of Catholic priests, which itself is reflective of the extensive knowledge of such misconduct by Catholic authorities. Reputable historical interpretation suggests that sexual abuse by Catholic clergy was not only internally, but also publicly, known to occur and would be prosecuted regularly by state authorities in alignment with Roman Catholic Church procedures.

25. Following the Reformation, however, the Roman Catholic Church began to disentangle from the primary terminals of state power, and the institution became increasingly relegated to social and religious affairs. It similarly grew image-conscious and began to cloak its knowledge and handling of sexually abusive clergy behind a veil of strenuous secrecy.

26. The Diocese of Chicago was established on November 28, 1843, and in 1845 the State of Illinois passed legislation for it to be established as a “corporation sole,” whereby it could operate as a single legal entity consisting of a single incorporated office (bishop of the Diocese), occupied by a single person (*the* bishop of the Diocese).

27. The Diocese of Chicago was eventually elevated to an *Archdiocese* in 1880, reflecting the tremendous growth and size of the ecclesiastical jurisdiction by that time.

28. Every Archbishop of Chicago since George Mundelein in 1924 has been designated as a Cardinal by the Pope.

29. The Archbishop of Chicago from August 24, 1965, through April 25, 1982, was Cardinal John Cody.

30. The Archbishop of Chicago from August 25, 1982, through November 14, 1996, was Cardinal Joseph Bernardin.

31. The Archbishop of Chicago from May 7, 1997, through November 18, 2014, was Cardinal Francis George.

32. At present, the Archbishop of Chicago is Cardinal Blase Cupich.

33. Serving nearly 2 million Catholics within its juridical boundaries, the Archdiocese of Chicago is reputed to be the third largest Roman Catholic diocese in the United States by congregant population and one of the wealthiest in the world. It manages approximately 216 separate parishes, over 150 schools, and a seminary school system with a flagship campus in Mundelein, Illinois. It has numerous departments, sponsors universities and hospitals, and is widely believed to control liquid assets valued in excess of \$1 billion.

34. The Archdiocese has exclusive ownership of and exercises absolute dominion over parish property, including all real property and the churches, facilities, and improvements constructed upon it.

35. All power rests with the Archbishop, who delegates authority over various departments and subdivisions to functionaries, who administer the complex operations of the Archdiocese of Chicago.

36. On the local level, parishes are generally designated by their association with a specific Catholic church, which may or may not also be supporting and administering a Catholic school.

37. Each parish is assigned usually one experienced priest designated as the “pastor,” who has almost complete authority over the parish, and may be supported by one or more associate pastors.

38. The assigned pastors generally reside in a semi-communal living structure known as a “rectory,” which is typically outfitted comfortably and maintained by cleaning, laundry, secretarial, and cooking staff.

39. Occasionally, a visiting or retired priest may also reside in a designated rectory and is then regarded as being “in residence” at the parish.

40. Many Catholic priests ordained in the Archdiocese of Chicago follow a similar path of Catholic grammar school, seminary high school, and either directly or following a religious bachelors degree ultimately study at St. Mary of the Lake Seminary in Mundelein, Illinois – all under the eye and stewardship of the Archdiocese of Chicago.

41. After successfully completing their course of study, upon the recommendation of the faculty, and ultimately upon the acceptance of the Archbishop, these aspirants may then be “ordained” as a priests specifically under the auspices of the Archdiocese of Chicago.

42. As a mandatory condition of ordination, each candidate for priesthood must swear perpetual obedience to the Archbishop and his successors.

HOLY ANGELS PARISH AND CATHOLIC SCHOOL (1969 – 1991)

43. In 1957 a man named George Clements became only the second ever Black priest ordained by the Archdiocese of Chicago, and after being assigned to his first position as an associate pastor at St. Ambrose promptly began sexually abusing children.

44. After being re-assigned to St. Dorathy Parish, in 1968 George Clements seized the political moment in the wake of Martin Luther King, Jr.’s assassination and instigated a very public confrontation with the then-Archbishop of Chicago, Cardinal John Cody, in an effort to accelerate his promotion to head pastor of a predominantly Black parish.

45. George Clements ultimately prevailed over the Archbishop of Chicago, who in 1969 appointed Clements as head pastor of an asserted “flagship” Chicago parish amongst those predominated by a Black congregation, Holy Angels Parish (the “Parish”).

46. Upon arrival, George Clements immediately reorganized the leadership of the Parish, and alongside the Holy Angels School principal, Fr. Paul Smith, and assistant principal, Sister Helen Strueder (“Sr. Helen Strueder,” “Sr. Helen,” “Helen Strueder,” or “Strueder”), the three aggressively instituted a totalitarian regime of control over the large student body of Holy Angels Catholic School (“Holy Angels School”), backed by draconian corporal punishment and extensive sexual molestation.

47. In parallel to Fr. Smith’s and Sr. Helen’s crackdown on the student body of Holy Angels School, Fr. Clements diabolically and successfully divorced both himself and the Holy Angels Parish from everything but the public semblance of subordination and obedience to the Archdiocese of Chicago.

48. With no budgetary dependence on the Archdiocese, no responsiveness to its Chancery Office, no engagement with its Office of Catholic Education, and no Holy Angels Parish council or school board to reckon with – Fr. George Clements and Fr. Paul Smith committed unrelenting child sex abuse there with impunity for more than two decades.

49. Ultimately, George Clements retired from Holy Angels in 1991 under highly suspicious circumstances, and upon his departure, Father Clements passed the baton to known serial child molester Fr. John Calicott.

FATHER JOHN TAKES OVER HOLY ANGELS

50. John Walter Calicott was born in Mississippi on September 28, 1947.

51. Though raised as a Baptist, after moving to Chicago at age six as part of his father's search for employment, John Calicott and his five siblings were enrolled in a diocesan Catholic grammar school – Holy Angels.

52. Calicott was an altar server at Holy Angels, along with his good friend and future Holy Angels Parish Council member, Rex Alexander.

53. Calicott eventually attended Quigley South for high school, Niles College of Loyola University, and ultimately Saint Mary of the Lake in Mundelein beginning in 1970.

54. His first assignment as deacon in 1973 was at St. Leo, 7747 S. Emerald Ave., under the tutelage of Fr. Howard Tuite, who had spent no less than seven years ministering at Holy Angels.

55. After being ordained on May 8, 1974, Fr. Calicott's first assignment as an associate pastor was at St. Ailbe parish, where Calicott committed credibly alleged acts of sex abuse that would ultimately compel his downfall almost 30 years later.

56. Calicott spent "a great deal of [his] ministry working with youth," including serving as head of the altar boys and the local chapter of the Boy Scouts. While there he also appears to have committed himself to a great deal of financial support for up to 15 boys attending Quigley South High School as well as the family of "one of our most promising seminarians," compelling Calicott to request a \$16,000 loan from the Archdiocese of Chicago out of desperation.

57. One of Fr. John Calicott's earliest victims – and by far his most consequential – was D.L.

58. D.L., who was an altar server and Boy Scout at St. Ailbe, was no older than 13 when Calicott began sexually abusing him in 1976, including oral sex on a Scout trip to Canada.

59. Calicott would go on to abuse D.L. more than 20 times over the course of the following two years, occasionally with another boy.

60. Calicott later wrote a series of rambling letters to D.L., one of which read (in part): “I try to sleep and my mind turns to sexual things I wanted to do with you when we were doing it but was too afraid to ask and the thought of these things keep me awake nights.”



D.L. as Altar Boy

P.S. 
Do ME ONE LAST FAVOR and destroy
THIS AFTER YOU READ IT.

**Postscript to Incriminating Letter from
Calicott to D.L.**

61. After a standard 6-year term, as of June 9, 1980, Fr. Calicott was assigned to Holy Name of Mary Parish, located at 11159 S. Loomis St., where Calicott spent the next 11 years under the exclusive guidance of Fr. Anthony Vader, a notorious child molester.

62. There, Calicott acted as the parish's Youth Minister, as well as the chief organizer of the altar boys, Boy Scout troop, and “several teen and young adult groups.”

63. Calicott has also been accused of committing child molestation at Holy Name of Mary.

64. Anthony “Tony” Vader and Calicott developed a special bond during the time they spent together at Holy Name of Mary, which came in handy for Calicott when he needed Vader to

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rally a simmering rebellion amongst the Black Catholic community against Cardinal Bernardin and the Archdiocese after Calicott was withdrawn for the first time in 1994.

65. Vader was a diehard Calicott supporter and voice of defiance against the Archdiocese of Chicago's policies regarding clergy sexual abuse of minors, and as of September 10, 2008, Vader had entrusted Calicott with Power of Attorney over his affairs.

66. From April 1, 1984, through March 30, 1987, Calicott served as Dean of Vicariate VI-C, under the Episcopal Vicar, Bishop Wilton Gregory.

67. On September 28, 1987, Calicott was appointed to the Clergy Personnel Board, where he exercised direct oversight into the handling of sexual abuse allegations against Archdiocesan priests.

68. With active cover from Fr. Vader for both his sexual molestation of boys and extended sexual and romantic relationship with at least one adult female, and as demonstrated by his appointment to multiple part-time administrative positions with both leadership and supervisory responsibility, John Calicott was viewed by the Archdiocese as a rising star with almost unlimited potential.

69. Prior to the public revelation of D.L.'s allegations against him, Calicott was widely regarded as a leading candidate for future elevation to bishop.

70. Given that there were no other Black associate pastors within the Archdiocese of Chicago with comparable experience, by the late 1980s Calicott must have been the obvious successor to George Clements at Holy Angels in the event of Clements's retirement.

71. In the wake of George Clements's sudden resignation from Holy Angels in the summer of 1991, by early September it was announced that Fr. Calicott had been appointed to his first head pastor position at Holy Angels, effective October 27, 1991.

72. Calicott immediately continued the Holy Angels tradition of its head pastor sexually abusing boys, including one victim who had been repeatedly molested by George Clements up to the point of Clements's departure from Holy Angels, only to then find himself similarly victimized by Calicott.

73. Fr. Calicott certainly relied on the classic means of getting isolated access to his victims, such as through School-sponsored extracurriculars.

74. And although John Calicott left the disciplinary measures to Sister Helen and her subordinates more so than George Clements, Calicott would still use discipline as a ruse to abuse Holy Angels students.

75. Fr. Calicott secured access to many of his victims through his familiar role as the *de facto* leader of Boy Scout Troop 484, which Fr. Calicott founded and chartered at Holy Angels for the primary purpose of sexually abusing boys in and around weekly Scout meetings and on long-distance camping trips to places like Kentucky and Canada. And Calicott did so.

76. The Boy Scout Troop that Calicott established also became the source of an undisclosed and notably taciturn pre-teen boy that Calicott informally "adopted" and housed in the Holy Angels Rectory for years, which somehow went unreported and unnoticed by Archdiocesan leadership despite the fact that Calicott had multiple on-site monitors during this time period.

77. Fr. Calicott also demonstrated a unique sexual appetite and risk tolerance for sexual encounters including multiple minors simultaneously.

78. For example, on one of the several occasions of sexual abuse by Fr. Calicott, one victim was referred to Fr. Calicott by Sr. Helen for misbehavior, along with another Holy Angels student. Shortly after their arrival at the Rectory, Fr. Calicott proceeded to perform oral sex on both

of the boys in their mutual presence while also remarking on how he had fantasized about such an encounter.

FR. ROBERT MAYER, THE CARDINAL'S COMMISSION, AND THE PROFESSIONAL FITNESS REVIEW BOARD

79. In 1991, a major scandal broke loose in the Archdiocese involving one of its priests, Fr. Robert Mayer. The Archdiocese had known of Fr. Mayer's predilection for plying minors with alcohol and sexually abusing them for nearly a decade and he was repeatedly transferred in the interim to escape reports stemming from various parishes. Eventually the Archdiocese pulled Fr. Mayer from St. Odilo in Berwyn, citing "personal reasons," however the parish eventually found out the real reason for his withdrawal, which led to uproar.

80. Cardinal Bernardin – whose documented awareness of Fr. Mayer's penchant for abusing minors was well established – had to take some action in response to the scandal. That took the form of a Commission that Bernardin appointed on October 25, 1991, to examine the problem of child sexual abuse by clergy in the Archdiocese, to review a select portfolio of cases involving specific priests, and to make recommendations for future policies and procedures with regard to such matters.

81. On June 11, 1992, a report entitled "The Cardinal's Commission on Clerical Sexual Misconduct with Minors" was sent to Cardinal Bernardin, which described some of the history of the Archdiocese's treatment of sexual abuse allegations.

82. Prior to 1983, such allegations were "handled by" the Archbishop, his Chancellor, or the Vicar General, and generally "lumped together with other clinical problems, [such as] cases of financial misconduct, and other celibacy-related problems."

83. In 1983, Cardinal Bernardin established the Vicar for Priests office to serve as a "pastor to the archdiocesan priests," although it was initially comprised of only one man.

84. Although the first Vicar for Priests, Fr. Thomas Ventura, had no special training with regard to reports of sexual misconduct with minors, somehow that became a prominent aspect of his ministry, and his office became the primary custodian of all files involving such allegations.

85. The number of allegations of child sexual abuse and the amount of people involved in the reviews of those allegations increased over time, however the prevailing sentiment was always to attempt to rehabilitate a credibly accused priest and return him to active ministry at a new parish where the school principal and parish council would not be informed of the priest's past history.

86. The Commission summed up its assessment of the Archdiocese's management of such allegations succinctly when it stated: "Very often, allegations of child sexual abuse have not been handled well in the Church because the overriding concern has been to do everything possible to protect the rights of the priest."

87. The Commission also made a number of recommendations for a new process for addressing allegations of child sexual abuse, which Cardinal Bernardin substantially endorsed in the form of the Professional Fitness Review Board.

88. The Professional Fitness Review Board (the "PFRB" or "Board") became a 9-member committee assigned the task of reviewing allegations of clerical sexual misconduct and making recommendations to the Archbishop, who retained final authority over all decisions concerning the priests under his leadership.

89. The PFRB was dependent upon an Administrator to the PFRB, who would conduct victim interviews, collect relevant documents, advise the PFRB, maintain official documents related to its activities, and generally liaise with Archdiocesan officials.

90. Upon the presentation of an allegation, the PFRB was expected to conduct a “First Stage Review,” and if the PFRB determined as a consequence of its initial, summary review of the allegation that there was “reasonable cause” to believe that the priest had engaged in sexual misconduct with a minor, the Board would immediately recommend his withdrawal from active ministry.

91. In principle, the Board, with the assistance of the Administrator, would conduct and review a further investigation of the matter as part of a “Second Stage Review,” at the conclusion of which the Board members would vote on recommendations concerning the priest to the Archbishop, which could range from conditions of a possible return to ministry up to permanent removal.

92. The formal policies and procedures endorsed by the Archdiocese of Chicago were arguably the first of their kind in the United States by a Catholic diocese and Cardinal Bernardin also officially endorsed the policy that *no* priest found guilty of a substantiated allegation of sexual abuse against minors would ever be returned to parish ministry.

93. As it turned out, those policies and procedures were inconsistently and informally applied, the Archdiocese did not cooperate with the PFRB in good faith, and Cardinal Bernardin’s commitment to permanently withdrawing credibly accused priests proved hollow.

CREDIBLE CALICOTT ACCUSER STEPS FORWARD

94. On information and belief, D.L., then an adult, confronted Calicott and sought assurances about the prospect of additional victims no later than March of 1993.

95. This confrontation was shared with officials of the Archdiocese of Chicago, including its Vicar for Priests, Patrick “Pat” O’Malley, and Calicott promptly retained legal counsel paid for by the Archdiocese.

96. No action was taken at this point, other than Calicott being appointed to the Archdiocese's Pastors Review Board (on April 21, 1993), leading D.L. to report that he was "not a happy camper."



Off: (312) 642-1837
Fax: (312) 642-4933

ARCHDIOCESE OF CHICAGO
VICAR FOR PRIESTS
645 NORTH MICHIGAN AVENUE, SUITE 543
CHICAGO, ILLINOIS 60611

Memo to File
From: Rev. Patrick O'Malley
Date: 3/29/93
Re: John Calicott

In speaking to John's attorney, Patrick Reardon, today I was informed that Fr. Calicott had received a phone call from the man who had brought allegations against him, i.e. the first man. Calicott was concerned that someone might feel that he had initiated this call. He had not.

Reardon just wanted to get it on record that Calicott had received a call but had not initiated it and did not encourage it. Apparently the call went on for twenty minutes or so with the young man rambling. He may have been under the influence of alcohol at the time. John says he listened and after twenty minutes was able to hang up.

ARCHDIOCESE OF CHICAGO

Office of the Archbishop



Post Office Box 1979
Chicago, Illinois 60690

April 21, 1993

Dear Father Calicott:

At the Presbyteral Council meeting of March 9, 1993, unanimous approval was given to my appointing you and a number of other pastors to form a Pastors Review Board (c. 1742). Consequently, I am hereby appointing you as a member of this board for a period of five years.

If a situation should occur in which there are serious questions about a pastor's leadership, I will choose two or more of the members of the Pastors Review Board to advise me. Since there are now thirty-six pastors available to choose from on this panel, and only two are needed in any given situation, it is likely that you will be asked to review very few cases and perhaps even none at all in the next five years.

While it is hoped that it will be unnecessary to call upon your assistance, I am very grateful for your willingness to serve.

With cordial good wishes, I remain

Sincerely yours in Christ,

Joseph Carl Bernardin
Archbishop of Chicago

Given at the Chancery

Thomas J. Popowski
Chancellor

Reverend John W. Calicott
Holy Angels Parish
607 East Oakwood Boulevard
Chicago, Illinois 60653

97. On March 31, 1994, Fr. Pat O'Malley reported D.L.'s allegations against Calicott to Steven Sidlowski ("Sidlowski"), the Administrator of the newly-created Personnel Fitness Review Board – but only after O'Malley first alerted Cardinal Bernardin directly.

98. Sidlowski, along with Ralph Bonaccorsi, of the newly-created Victim's Assistance Ministry, met with D.L. that same day, at which time D.L. detailed his allegations against Calicott along with the further allegation that D.L. had previously reported his abuse to at least two other Archdiocesan priests, who obviously did nothing.

99. D.L. also identified two additional victims of Calicott's sexual abuse at St. Ailbe by name, with one being F.A., and the other primarily known within Archdiocesan records as "Victim IP."

100. At least Bonaccorsi found D.L. to be "extremely credible" and Sidlowski sprang into action to advise Pat O'Malley ("O'Malley") and Tom Paprocki ("Paprocki"), Bernardin's delegate to the PFRB, of the seriousness of the situation.

Phone Call from Tom Paprocki 4-1-94:

Tom called me at home this Good Friday morning to inform me that he had received my phone messages regarding a new allegation against John Calicott. He said he would be seeing Cardinal Bernardin later that day and that he would inform him with as much information that I had given Tom as of the end of our conversation.

I told Tom that Pat O'Malley and I had spoken late on Holy Thursday evening, that POM would be informing John Calicott about the situation on either Holy Saturday or Easter Sunday, and that I would call John back on Monday to confirm that POM had spoken with him and to arrange for an in-person meeting to request a response to the allegation. I told Tom that the meeting would likely take place either late Monday afternoon (4-4-94) or on Tuesday (4-5-94) if at all possible.

I explained to Tom many of the details of the allegation I had received to date and how others apparently were told about the situation, including [REDACTED] (who Tom Paprocki knows) and another Archdiocesan priest who had been told by [REDACTED] when he was in the college seminary (although he requested confidentiality at that time). I also told Tom that Ralph Bonaccorsi found Mr. [REDACTED] "extremely credible."

Notation by Steve Sidlowski, PFRB Administrator

101. On April 5, 1994, Sidlowski also spoke with "Victim IP," who, per Archdiocese-drafted summary, confirmed that D.L. had reported his victimization by Calicott to Victim IP while the abuse was occurring, and that Victim IP had also been victimized by Calicott, involving several instances of mutual oral sex over the course of approximately six months when Victim IP was about 14 years old.

102. Public reporting would later confirm that the periods of D.L.'s and Victim IP's victimization by Calicott were not only overlapping, but on more than one occasion involved both of them being victimized by Calicott *simultaneously*.

103. The third victim identified by D.L., F.A., confirmed that he had been abused by Calicott, most likely in 1979 or 1980, as well as the fact that D.L. had reported the abuse to him while D.L. was still a minor. Unsurprisingly, Calicott's abuse of F.A. also began on a Boy Scout trip to Kentucky when he was about 16 years old, where F.A. awoke in a hotel room to find Calicott fondling his genitals.

104. It is noteworthy that D.L. was a lifelong Catholic that had attended seminary school through college, and that his allegations were supported by original copies of handwritten love letters from Calicott and the specific identities of at least two additional Calicott victims – one of whom personally observed more than one instance of the abuse. *That* is the level of evidence that was necessary for the allegations to be deemed credible, and it is notable that, unlike the majority of Calicott's victims, D.L. was not Black.

105. In any event, later the same day (April 5, 1994) that Victim IP gave his statement to him, Steve Sidlowski also met with Calicott, along with Calicott's attorney, Patrick Reardon, and Fr. Pat O'Malley.

106. When Calicott heard the allegations – which he knew to be true – he wept uncontrollably before ducking out of the meeting with Pat O'Malley, who had already attempted to protect Calicott from the allegations for at least a year.

107. Sidlowski immediately recommended to both Cardinal Bernardin and the PFRB that Calicott be immediately withdrawn from Holy Angels and reaffirmed that position to Tom Paprocki the following day.

108. On April 6, 1994, the PFRB was advised of the Calicott allegations, determined “that there is reasonable cause to suspect that Rev. Calicott engaged in sexual misconduct with a minor,” and formally recommended his withdrawal to Cardinal Bernardin.

109. Given the recent public scrutiny of and official policy changes by the Archdiocese of Chicago regarding clergy sex abuse, at that time Cardinal Bernadin felt he had no choice but to immediately place Calicott on “administrative leave” on April 7, 1994, which Calicott only superficially went along with.

110. Bernardin *really* did not want to do this, not just because Cardinal Bernardin had “worked very closely with” Calicott, or because he was on the “principal list” of bishop candidates, but because Bernardin was very sensitive to the appearance of racism amidst accusations that the Archdiocese was applying a double standard by withdrawing Calicott but failing to act in consistent fashion when Cardinal Bernardin himself was accused of sexual abuse in 1993.

111. Calicott was attuned to this concern, as well as the Archdiocese’s extreme mindfulness of public perception, so although Calicott withdrew from Holy Angels in accordance with Bernardin’s order, he was quick to mobilize his supporters against the action.

112. To be sure, although Calicott proved emotionally volatile, it is evident that he carefully choreographed a multi-pronged campaign of pressure and manipulation in order to return to Holy Angels.

113. On the one hand, Calicott was careful in his direct dealings with Cardinal Bernardin, seeming to accept some responsibility for his misbehavior and even the need for some personal assistance, but it is plain to see that these efforts were calculated to maintain the goodwill of Cardinal Bernardin, who had the final say on Calicott’s fate and various requests for accommodations regardless of the recommendations of any board.

114. At the same time, Calicott called upon his more influential supporters, including Fr. Vader, Fr. Michael Pflieger, and George Clements to push back.

115. Vader wrote a defiant letter to Bernardin regarding Calicott's withdrawal, organized "prayer vigil" events on Calicott's behalf, and persuaded many parishioners of Holy Name of Mary to write to Bernardin to express their dissatisfaction.

116. Fr. Pflieger openly railed against the Archdiocesan process and policies and threatened to resign from the Catholic Church in protest.

117. Fr. Clements called upon parishioners at St. Thomas the Apostle and Holy Angels to support Calicott against Archdiocesan racism.

118. The *Chicago Defender* published a letter slamming Cardinal Bernardin for applying a double standard, and analogized the process of Calicott's removal to that of the medieval inquisition.

119. The letters and petitions rolled in, directed both at Cardinal Bernardin and the PFRB.

120. There was also a great deal of pressure leveraged against D.L., whose identity as the primary accuser may have been inexplicably revealed by Archdiocesan officials to the Parish leadership at Holy Angels on April 8, 1994.

121. Most likely Calicott made calculated disclosure of D.L.'s identity as the primary accuser to select recipients in order to generate a pressure campaign against him (and probably Victim IP).

122. For whatever reasons, shortly thereafter D.L. felt compelled to personally address the leadership of Holy Angels in a speech that was critical of the Archdiocese's removal of Calicott.

123. This speech would later be cited by many parishioners and priests, including Fr. Robert Miller, as D.L.'s unequivocal recantation of his allegations against Calicott.

124. Any such characterization of the speech was patently false, has been repeatedly verified as false, and the Archdiocese knew that at all relevant times – and yet, some of those Calicott-era parishioners that remain at what is now Our Lady of Africa continue to perpetuate this falsehood *to this day*.

125. Although Bernardin had commissioned the recommendations for the Archdiocese's policies on allegations of clergy sexual abuse of minors, directed the organization of the PFRB, and very clearly articulated a commitment to the principle that *no* credibly accused priest would *ever* be returned to parish ministry, this was all still very uncharted territory for everyone involved.

126. While the policies had been formally adopted, the PFRB impaneled, and various supporting officers assigned (including the Administrator of the PFRB, the Vicar for Priests, and the Archbishop's Delegate to the PFRB), nobody really knew what they were doing – and the Archdiocese's selective information disclosure did not help the cause of protecting children.

127. Stephen Sidlowski, the inaugural PFRB Administrator, was seemingly very well-intentioned, but he was also clearly kept in the dark about prominent aspects of accused priests' full situations and was converting the written policies to practical application on the fly.

128. Fr. Pat O'Malley, as the Vicar for Priests, had a very convoluted and obviously conflicted relationship with the Professional Fitness Review Board proceedings, as demonstrated in the review of Fr. Calicott.

129. For one thing, Calicott disclosed the allegations to Pat O'Malley well before they were disclosed to Sidlowski, seemingly because O'Malley hoped that D.L. could be persuaded against a formal process with the Archdiocese.

130. Once the PFRB process was initiated, however, Fr. Pat O'Malley seemingly functioned both as Calicott's primary liaison to the Archdiocese and as a primary source of information regarding the allegations to the PFRB, but in all instances generally acted as a *de facto* advocate for Calicott.

131. A Cook County court would eventually determine that many of Pat O'Malley's records and insights were protected from discovery by virtue of the priest-penitent privilege, on the theory that as the "Vicar for Priests" he was effectively operating as a "priest to the priests," and therefore certain private dialogues with accused priests were akin to a form of confession, thus invoking the statutory privilege.

132. Before the end of April, Calicott was already directly soliciting Cardinal Bernardin to be returned to Holy Angels, citing his deep concern for "the pain and hurt presently engaging the African-American Catholic community" that Calicott himself caused.

133. When that didn't work, Calicott implored Fr. Pat O'Malley to persuade Bernardin to let him speak at a meeting with the parish leaders of Holy Angels and Holy Name of Mary and to also pass along his personal message to Bernardin: "John wants you to know that he swears he has never done anything else to anyone else over the years."

134. Calicott followed that up by dispatching Fr. Dennis Riley and Fr. Donald Ehr to request that Calicott be allowed to "celebrate" mass at Holy Angels "on [Calicott's] 20th anniversary" of getting ordained the following Sunday.

135. Bernardin made an "exception" for Calicott and would permit him to preside over the mass – so long as Calicott stuck to the script. Specifically, Calicott was told to steer clear of his complaints about the process and as recorded in a memo drafted by Pat O'Malley:

“[Cardinal Bernardin] asked [Calicott] to tell the people that he is going away and needs the help that he will be getting. This is a fact. At some point John will have to publicly admit that something transpired and that the young man who brought the allegations forward is a credible young person. John says that he has already said this to people. But we are still getting reports that people think the allegations are false, for example, the heading on the many petitions that came indicates that people think the allegations are false.”

RETURN FATHER JOHN CALICOTT TO HOLY ANGELS AN AFRICAN AMERICAN FAITH COMMUNITY'S APPEAL		
We the undersigned, representing the African American Faith Community, are actively joined together in the movement to return Father John Calicott to Holy Angels Church. Father John Calicott has been a superior role model throughout the years for the African American Community and in particular African American children. We now firmly believe that the allegations made against Father Calicott were scurrilous and totally without substance. Furthermore, Father Calicott has fully participated in the Archdiocese of Chicago's "Procedures for Determination of Fitness for Ministry" process to prove he is no risk to children. Consequently, we are resolute in our commitment to seeing that the Archdiocese restore Father Calicott to the pastorate of Holy Angels Church IMMEDIATELY.		
Name	Signature	Address

Caption from Calicott Petition

136. That Calicott claimed he was unaware of those petitions was a preposterous lie and the Archdiocese knew that.

137. Not everyone actively supporting Calicott was convinced that he was innocent of the allegations, including Calicott's brother, who mostly complained that Fr. Calicott's penchant for sexually abusing children should have been kept confidential by the Archdiocese – not that Calicott wasn't a child molester.

138. Rex Alexander, Calicott's childhood friend and Holy Angels Parish Council member, was merely "neutral" as to whether Calicott had engaged in sexual misconduct with minors.

139. What was most consistent amongst Calicott's supporters and the Archdiocese of Chicago is that none of them really cared.

140. On information and belief, Calicott spent approximately six months at a concealed, in-patient facility before relocating around November of 1994 to the Cardinal Stritch Retreat

House (a.k.a. “Koenig Hall”) – a residence in Mundelein that was specially designated for credibly accused Catholic priests.

141. Calicott was, on paper, subject to a multitude of liberty restrictions and verification requirements as part an “Individual Specific Protocol” (ISP).

142. The conditions of Calicott’s ISP required him to prepare daily itineraries to account for his whereabouts, call in every four hours while away from the residence in Mundelein, and obviously to never be alone with minors.

143. Calicott was indignant about these restrictions and defied them almost immediately upon his arrival at Koenig Hall, before Bernardin reassured Calicott and persuaded him to feign compliance pending the Second Stage Review by the PFRB.

144. It was around this time that Calicott began consistently side-stepping the issue of his actual guilt for committing child sexual abuse by emphasizing some “expert’s” opinion that Calicott was “not a risk to children.”

145. Even before returning to Illinois in the fall of 1994, Calicott clearly felt that he had done his time and was motivated not only to force his restoration to Holy Angels, but also to do so without admitting to the parishioners that he was actually guilty of committing child sexual abuse.

146. In a mid-summer letter from Calicott that was published in the Holy Angels Parish bulletin, Calicott clearly misled his parishioners by stating that authorities had “found nothing indicative of any problem insofar as the ‘allegations’ are concerned.”

147. Calicott claimed he had been misquoted by those who prepared the bulletin.

148. The Archdiocese also caught wind of a flyer announcing Calicott’s appearance at a Holy Name of Mary event before his scheduled return to Illinois, with Fr. Pat O’Malley advising

Calicott that “I think you can presume it will be disturbing to some people around here, especially the Cardinal and the members of the Review Board. They may well feel manipulated.”

149. Calicott claimed that the flyer was published as a consequence of Fr. Vader’s uncontrollable exuberance in supporting him and that he himself had not approved its publication or made any plans to attend the event.

150. In reply, Pat O’Malley explained: “As you know, the Cardinal has been under tremendous pressure from people who support you. He has been made to feel like the bad guy. This flyer could have been seen as one more effort to pressure him.” Which is exactly what it was.

151. Come January of 1995, the Archdiocese had run out of new hoops for Calicott to jump through and Cardinal Bernardin was prepared to put his finger on the scale with the PFRB to re-install Calicott at Holy Angels under the cover of PFRB approval.

152. On January 14, 1995, Bernardin wrote directly to the PFRB acknowledging that it “is true that the abuse John [Calicott] is accused of actually happened,” but it was apparent that Bernardin wished to reinstate Calicott at Holy Angels while struggling with “the problem of explaining publicly” why Calicott should merit an exception to Bernardin’s own policy that “when such abuse occurs the priest is never to be placed in parish ministry again.”

153. On or about January 11, 1995, John Calicott drafted a formal response to the allegations and clearly admitted “that a type of sexual misconduct with minors did take place.” Calicott vaguely described the incidents as “something into which I almost ‘stumbled,’” and reported that “I terminated the events which did transpire with the strong expectation that this would result in my being reported and incarcerated.”

154. Despite admitting that he had sexually abused at least two minor boys while at St. Ailbe, it didn't take long for Calicott to start claiming that one of his victims needed "psychological help" and began remonstrating against "the process" of his removal.

155. On January 21, 1995, the PFRB "initiated a second stage review in the case of Father John Calicott," with Thomas Paprocki remarking that: "Normally, a second stage review is to take place within 120 days of the first stage review. In this case, the second stage review was delayed pending" a [redacted] passage that almost certainly referenced Calicott's psychological assessment.

156. Ultimately, the PFRB decided to continue the Second Stage Review to permit a "representative committee" of the PFRB to meet with Calicott and D.L. separately and to follow up with Calicott in writing to address the many questions that he left unanswered in his formal statement to the Board.

157. On January 23, 1995, in a conference call that included Steve Sidlowski and Calicott's attorney, Pat Reardon, Calicott explained that "I'm angry about this whole fucking thing" and that he was having difficulty dissuading Holy Angels' parishioners from actively protesting against the Archdiocese.

158. Although Calicott informed Sidlowski that he "very reluctantly" intended to continue abiding by his ISP since "things are moving," if he was not reinstated promptly then "It's gonna blow-up [... and] They don't want it to blow-up."

159. On February 15, 1995, Steven Sidlowski and three members of the PFRB met with D.L. who, still under active pressure from Calicott and his supporters, told the Board members that he wished for Calicott to be reinstated at Holy Angels.

160. That same day D.L. – apparently under the spell of Calicott’s active manipulation – phoned his corroborating witness and brother in victimhood, Victim IP, to lean on him to dilute his complaint based on a statement most likely made to him by Paprocki to the effect of: Only “[D.L.] and [Victim IP] are the persons preventing John Calicott’s return to Holy Angels Parish.”

161. Later that same day Calicott phoned Sidlowski to request a “special,” accelerated meeting of the PFRB to complete its Second Stage Review *before* the meeting scheduled for March 18, 1995, and the following day Calicott requested another special accommodation to return to the Holy Angels Rectory full-time, purportedly in order to keep his belongings there secure in the absence of Fr. Riley, who had recently been transferred.

162. Both of those requests were denied by the PFRB.

163. After a great deal of tactical planning with Pat Reardon and Cardinal Bernardin, Calicott met with a subcommittee of the PFRB on March 15, 1995, with the expectation that his fate would be decided at the next PFRB meeting on March 18, 1995.

164. True to form, Calicott basically told the Board members what he thought they needed to hear: (1) that he wasn’t in denial over the allegations; (2) that what happed was “wrong, immoral,” but (vaguely) also not as egregious as what was alleged; (3) that Calicott was still speaking with D.L. somewhat frequently, but that those interactions were mostly initiated by D.L.; (4) that there were no other victims “period;” and (5) that he wanted the PFRB to recommend his reinstatement to Bernardin.

165. When asked by Steve Sidlowski whether he would be willing to make a more definitive admission of guilt to the Holy Angels parishioners as a condition of being reinstated, Calicott’s attorney, Pat Reardon, declared that they were not willing to address that idea unless and until it was formally recommended.

166. Overall, Calicott and Fr. Pat O'Malley both felt the meeting had gone "well."

167. But the PFRB was not ready to reinstate Calicott. At their March 18, 1995, meeting, the PFRB determined that it was *not* reasonable to return Calicott to ministry and recommended that Calicott's ISP remain in effect, but nonetheless decided "to continue the Second Stage Review pending receipt of additional information."

168. In a summary drafted by Tom Paprocki, who described the PFRB's Calicott discussion as being over three hours in duration, a synopsis of each Board member's final conclusion was provided, reflecting a divided willingness to consider returning Calicott to parish ministry and a clear consensus that as a precondition Calicott would need to make a full disclosure to Holy Angels.

169. It was also evident that the Board members did not appreciate the pressure they were under to reinstate Calicott.

170. Paprocki concluded his memorandum by agreeing with the PFRB's recommendation not to return Calicott to active ministry, adding: "if we allow John to go back now, that might be a politically expedient solution to the immediate problem in the short term, ***but could have disastrous consequences in the long run.***" (Emphasis added)

171. Steve Sidlowski had the unenviable honor of reporting the news to John Calicott, who immediately became "enraged and incensed," freely cast expletives about his frustrations with his protocol conditions and repeatedly threatened major demonstrations against the Archdiocese's alleged racial discrimination against him:

Saturday evening after the meeting, Steve Sidlowski called and told me that he had phoned John Calicott to tell him of the Board's recommendation, since John had insisted on this. Steve said that John was "very, very angry. He was more furious by far than I have ever heard him when I explained the Board's recommendations."

Specifically he quoted John as saying, "I ain't gonna do no protocol. F--- it, O.K.? The s--- is gonna hit the fan. I'm through with it. I mean it. Wait 'til the media hear about this. These people are ready to go."

Steve said he then explained that the final decision will be the Cardinal's. If John wanted, he could arrange to meet with the Cardinal.

John responded, "It's gonna blow. These people are ready. Have you heard of George Stallings? (laughter) People are leaving the Church over this, man. I will rot before I kiss their white asses. I am not gonna keep that protocol. I tried to cooperate. I kept the protocol. This is what I get. When I sit down with the Cardinal, he'll have to make his decision. He can do whatever he wants. If Bernardin wants to excommunicate me, he can."

John concluded by saying, "You are discriminating against me because I am a Black man, a strong Black man. This is how the White Church takes it out on a Black man. I'm telling you, it's coming. My time will come." Then he hung up.

172. In a fit of petulant rage, Calicott then promptly left Koenig Hall in Mundelein and headed for the Holy Angels Rectory, from where he communicated his intention to disregard his ISP and plans to be "spending the night and staying from there on out apparently."

173. By March 20, 1995, Calicott had regained his senses and returned to Mundelein, and the following day called Sidlowski to apologize for his abusive conduct – because Sidlowski was still the Administrator for the PFRB.

174. Sister Sara Hale, a reputedly louche and sexually active nun at Holy Angels, issued an immediate jeremiad to Cardinal Bernardin with accusations of racism.

175. In reply, Cardinal Bernardin's delegate to the Professional Fitness Review Board, Thomas Paprocki, countered the insinuation of racism by emphasizing that, with the exception of Calicott, amongst the "unfortunately significant number of priests removed from ministry because of accusations of sexual misconduct with minors, all of them hav[e] been white."

176. This state of indecision regarding Calicott's return to Holy Angels was very distressing for Cardinal Bernardin, who obviously wanted and intended to reinstate Calicott but needed the approval of the PFRB for political cover – so he moved ahead with his plan and turned up the pressure on the PFRB.

177. Just a few days after Cardinal Bernardin was formally advised of the PFRB's decision to continue – seemingly indefinitely – Calicott's Second Stage Review, Fr. Pat O'Malley was already devising a strategic plan of action for Calicott's return. Several of the risks considered included:

- a. "risk to the reputation of the Church (i.e. it could be said that it does not value the safety of Afro-American children as much as it values that of White children);"
- b. "The reputation of the Cardinal himself is on the line since he has said he would not return child abusers to pastoral ministry;"
- c. "The credibility of the policies and procedures of the archdiocese (including the whole PFRBD) is on the line;" and
- d. "No insurance company will cover future liabilities."

178. Pat O'Malley further advised that, "[i]f the Cardinal decides to accept these risks," then the following process should be implemented: (1) Calicott would first need to draft, with the assistance of the Archdiocese, a statement to be made to the Holy Angels Pastoral Council containing a "clear and unambiguous declaration of the truth;" (2) there must be some means for those "who do not want John to return" to make their sentiments known to Bernardin; and (3) Bernardin would then "take the information back to the PFRB to reassure them that the people know the facts and still want John back." Following receipt of the PFRB's "input," Cardinal Bernardin could then return Calicott to Holy Angels, but only with certain non-negotiable conditions, including that Calicott could not be alone with minors, would be subject to active monitoring (including a specially designated "on-site monitor" who would live and work at Holy

Angels), and would have his ISP periodically evaluated by the Vicar for Priests (i.e., Pat O'Malley) and the PFRB.

179. The terms of this memorandum would inevitably become Cardinal Bernardin's proverbial deal with the devil, and clearly manifested Bernardin's intent to return Calicott to Holy Angels irrespective of the final conclusions of the PFRB's Second Stage Review.

180. Around this time, the Archdiocese's inaugural Administrator for the Professional Fitness Review Board, Stephen Sidlowski, resigned – at least in part due to frustrations over the Archdiocese's concealment of relevant information and failure to heed his concerns and recommendations.

181. On April 4, 1995, Cardinal Bernardin and Pat O'Malley met with Calicott to present the Archdiocese's terms, and the next several weeks were spent working on Calicott's statement to the Holy Angels Parish Council, which was complicated by the fact that Calicott was very resistant to being clear and unambiguous about his past acts of child molestation.

182. On April 28, 1995, Fr. Tom Paprocki, as Cardinal Bernardin's Delegate to the PFRB, wrote directly to "Acting" PFRA Bernadette Connelly and the PFRB requesting that the PFRB "consider" the proposed conditions of Calicott's return to Holy Angels, while deliberately eliding to mention that the deal had already been agreed to with Calicott.

183. The PFRB met on April 29, 1995, and were advised of "the Cardinal's [via Tom Paprocki] response [to] J.C.'s Second Stage Review." However, there was insufficient Board attendance to form a quorum, so all matters pertaining to John Calicott were tabled.

184. Tom Paprocki, who attended the meeting, did nonetheless report to Cardinal Bernardin that: "I believe it would be fair to say that [the four present members of the PFRB] were not very receptive to the proposal for Fr. Calicott's return."

185. Vicar for Priests, Fr. Patrick O'Malley, provided a slightly more specific synopsis:

“There is an obvious concern on the part of the members of the Board present about the way Calicott is facing the issues in front of him. **Some members feel like they are being manipulated at this point.** They have questions as to whether Calicott has really faced up to the issues.” (Emphasis added)

186. On May 12, 1995, the Diocesan Priests' Placement Board – primarily charged with advising the Archbishop on priestly appointments and transfers – noted that: “John's situation remains to be determined. He is exploring possibilities of gradually returning to active ministry. ***This can only happen with the support of the Fitness Review Board.***” (Emphasis added)

187. The next scheduled meeting of the PFRB occurred on May 13, 1995, which specifically noted the Paprocki correspondence, as well as what appears to be the undisputed fact that Calicott was openly and notoriously violating some component of his ISP.

188. The decisions made by the Board with regard to Fr. Calicott at this meeting have been redacted wholesale, but it is evident that the PFRB was demanding the production of some specific information concerning Calicott.

189. On May 22, 1995, at the behest of Fr. Calicott, D.L. wrote directly to Cardinal Bernardin requesting a “PERSONAL MEETING WITH YOU REGARDING THE MATTER OF JOHN W. CALICOTT” and attached a transcript of his testimony provided to the subcommittee of the PFRB on February 15, 1995 – the most prominent feature of which was D.L.'s emphatically declared wish that Calicott be restored to Holy Angels.

190. This act, combined with his testimony on February 15, 1995, combined with the mysterious public revelation of D.L.'s identity, combined with D.L.'s statement to Holy Angels parishioners shortly thereafter, combined with his other strategically-timed written and oral expressions of dissatisfaction with the Archdiocesan “process” in starkly Calicott-Esque terms,

combined with the universally understood fact that Calicott was maintaining a regular and ongoing dialogue with D.L., combined with D.L.’s sister’s description of D.L. and Calicott as “very good friends” (although she clearly believed that the sexual abuse had occurred), combined with the fact that D.L. hard-pressed Victim IP almost immediately after he testified to the PFRB subcommittee, combined with the fact that D.L. would subsequently re-characterize Victim IP as a mere “corroborator” rather than an independent victim, combined with Victim IP’s request to “retract” (but not *recant*) his allegations, in the aggregate, strongly tends to support three conclusions, that:

- (1) Neither D.L. nor Victim IP were ever willing to recant even a single detail of their allegations of sexual abuse committed against them by John Calicott;
- (2) John Calicott was actively and openly attempting to psychologically manipulate D.L. and, to a lesser extent (and mostly through D.L. as an intermediary), Victim IP, in an effort to neutralize their allegations as much as possible; and
- (3) Both the Archdiocese generally and everyone involved in the Second Stage Review process specifically understood all of this in real-time.

191. In any event, D.L.’s overture directly to Bernardin seems to have served Calicott’s purpose, and Bernardin intended to personally appear at the PFRB’s next scheduled meeting on June 17, 1995, in order to advocate on behalf of Calicott – a truly extraordinary move that didn’t come to pass only because Bernardin became acutely ill and was admitted to the hospital.

192. The PFRB held their meeting as scheduled on June 17, 1995, and present for the Board’s consideration of Fr. Calicott’s return to Holy Angels was not just the Board members, the Board’s acting Administrator (Bernadette Connolly), and Cardinal Bernardin’s Delegate to the Board (Tom Paprocki), but also Bishop Raymond Goedert, Bishop George Murry, and Fr. Pat O’Malley, in a naked demonstration of support for Calicott.

193. Bishop Goedert – Bernardin’s Chancellor, chief lieutenant, and *de facto* acting-Archbishop in Bernardin’s absence – delivered scripted remarks to the PFRB, in relevant part as follows:

“As you know, the pastoral situation of Holy Angels has been very much on [Cardinal Bernardin’s] mind. Because of the pastoral needs of Holy Angels parish, the Cardinal would like to move ahead towards returning Fr. Calicott to some kind of monitored ministry at the parish [...] At this time, the Cardinal is persuaded that, for the following reasons, Fr. John Calicott is not a risk to children: [1.] the events of abuse took place some 19 years ago [...] 2.] during the intervening years, until he was withdrawn from ministry, Fr. Calicott carried on his life and ministry in an exemplary manner [...] points 3-7 are redacted [...] Holy Angels is a pivotal parish in the Afro-American community. The Cardinal really believes the welfare of this parish is intimately bound into the decision he will ultimately have to make. Were it not for the pastoral needs of the parish, he would not be coming to you so early in this process [...] But the Cardinal does not feel he can wait too much longer at this time. The temporary administrator [Fr. Donald Ehr, of St. Elizabeth] who has been serving so generously for the past several months is feeling the pressure and wants to get back to his own parish to work full time there. We have not been ableⁱ to surface the name of any priest willing to accept the administratorship of the parish at this time. Fr. Calicott has been a key religious leader in that community since his assignment to Holy Angels. While it was not an easy task to take over from the previous pastor, Fr. George Clements, Fr. Calicott has done a fine and commendable job. While acknowledging that the welfare of children is our primary concern, I am persuaded that children and minors will not be at risk with Fr. Calicott. With the people fully informed and with proper safeguards in place, even the possibility of such risk will be minimal. **Quite simply, the Cardinal wishes your help in returning Fr. Calicott to the pastorate of Holy Angels as soon as possible – within a very short time – for the sake of the people of the parish.**” (Emphasis added)

194. The affirmative pressure applied to the members of the PFRB to recommend the reinstatement of Calicott cannot be overemphasized, as evidenced by remarks made at the meeting: “Everyone is trying to get [Calicott] back into ministry and I am angered and enraged at what is happening. I feel our back is being put to the wall;” and “I feel the decision has been made [by Cardinal Bernardin] – why ask us?”

195. These concerns were subsequently reaffirmed by several of the PFRB members, who variously remarked of John Calicott’s Second Stage Review:

“I think a very significant factor that never happened in any other case was the constant message from the Cardinal that he would like to be able to send Fr. Calicott back if the board felt that there was some way in which it could be done. I believe that this caused the board members to start off with the premise ‘Is there some way we can return this man..(sic)’ which is a different approach than has happened in any other case.”

“I felt that too. I felt that pressure. When we had Bishop Goedert and Bishop Murry come.”

“I was really offended by their coming and the pressure put on us by [the Fr. Calicott] case. I almost quit and I’m still considering quitting. It has damaged my view of the whole process [...] A lot of it had to do with race; a lot of it had to do with a decision already being made that this man was going to go back. The pressure was here and it was treated much differently than any other case. I was really very angered by it, and upset by it, and I still am. I don’t think he belongs [at Holy Angels]. [Calicott] has manipulated everybody and everything and continues to do that [...] it was pressure, significant pressure that had not occurred on any other case.”

“This [discussion of the Calicott Second Stage Review] is opening old wounds.”

“What you’re asking us to try to describe was a very traumatic thing for us as a board. Before we had been able to work by consensus when we came in here to work. And that was the end of that. So I’m surprised that we survived it.”

“I think there was pressure because [Calicott] was Black.”

196. The PFRB was also presented with a draft of the proposed statement that was intended to be delivered by Calicott to the Holy Angels Parish Council, which the Archdiocese had closely scrutinized and negotiated with Calicott, who was openly resistant to actually taking any public accountability.

197. Even after Calicott accepted the Archdiocese’s revisions – which Calicott felt “appear dangerously to nuance the interpretation of the actual events towards error” (whatever that means) – the most “clear and unambiguous declaration of the truth” that Calicott could muster was, in its entirety, as follows:

“About this time last year, I spoke to you regarding allegations of sexual misconduct with minors from approximately nineteen years ago which, at this time last year, recently had been placed against me. I noted then and wish to reiterate that there is real substance to the allegations; thus, although I am in significant disagreement with some of the details as presented to me, I do not feel that I can

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197. speak further about the substance without betraying confidences, the wishes of the young man who put forth the allegations and the reputations of third parties. Further, I would like again to reiterate the fact that I did make a deep, personal effort to preclude from the young man that very hurt and pain which my actions brought onto his young life. I failed. And I do again apologize to that young man for that pain and hurt. Aware that what did transpire could not help but to cause the Church concern about the possibility that I could be a risk to children, I accepted, as you well know, [Redacted].”

198. The external pressure on the PFRB notwithstanding, the six members present at the June 17, 1995, meeting could not reach a consensus on returning Fr. Calicott to Holy Angels.

199. What they *did* reach a consensus on was that Fr. Calicott’s draft statement intended for the Holy Angels Parish Council was woefully inadequate for failure to take responsibility for his misconduct and to acknowledge that there was not one, but three alleged victims.

200. Ultimately, the Archdiocese wrote a new statement that was delivered to the Holy Angels Parish Council by Bishop Murry and Tom Paprocki – rather than Calicott himself – on June 27, 1995, ostensibly for the purpose of providing the necessary full disclosure in order to gauge the sentiments of the Parish. However, other than the remarks that “As Father Calicott has acknowledged, there is real substance to the allegations” and “the Review Board determined that there was reasonable cause to suspect that Father Calicott had engaged in sexual misconduct with at least two minors,” the “revised” statement was completely devoid of further details.

201. Since the matter of Calicott’s reinstatement to Holy Angels remained pending and Fr. Donald Ehr had been permitted to return to St. Elizabeth full-time, on June 30, 1995, Fr. Robert “Bob” Miller was appointed “Parochial Administrator” of Holy Angels, effective July 15, 1995.

202. On August 2, 1995, in contemplation of the PFRB’s meeting scheduled for August 12, 1995, Tom Paprocki wrote to the PFRB on behalf of Cardinal Bernardin requesting that the PFRB “make a definitive determination and recommendation” as to:

“Whether it is reasonable to return Father Calicott to ministry in view of all the facts and circumstances, giving appropriate consideration to the safety of children and the rights of the priest, or whether his withdrawal from ministry should continue; if his withdrawal should not continue, whether any restrictions should be imposed on him in his return to ministry.”

203. On August 4, 1995, Fr. Calicott made a personal, written appeal to the PFRB:

Members of the Professional Fitness Review Board:

I am writing this letter to request your recommendation that I return to pastoral ministry and resume my calling as pastor of Holy Angels Church.

I know you have much information to evaluate and consider. It is a source of personal remorse and sadness to me that my own actions have brought harm to others and occasioned this necessary process of evaluation. I live with this remorse and acknowledge it to God daily, as I will for the rest of my life.

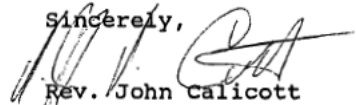
I know you have expressed concern about the possibility of other victims. No other incidents have been alleged against me because there have been no other incidents. That is the simple truth. I state this not to mitigate my own remorse at what did happen, but to respond to your concern.

I share your desire that all children be protected and cared for. If I were a threat, I would resign from the priesthood.

I request the opportunity to resume my duties at Holy Angels because I know I am not a threat to children. I do not rely solely upon my subjective belief. Over the past sixteen months I have participated in the most intense [REDACTED] possible to provide objective data assuring my parishioners, my church, my bishop and myself that I pose no threat to children. I have benefitted from [REDACTED]

I have tried to provide all I can to allow a complete evaluation. I have spent many years in the work of the Lord and of my church. My heartfelt desire is to return to that work.

Sincerely,


Rev. John Calicott

204. Calicott's big moment came at the PFRB's meeting on August 12, 1995. Although handwritten notes from the meeting tend to indicate that, of the eight board members in attendance, at least four were undecided on the question posed by Cardinal Bernardin, and a fifth was outright

against it, given the false urgency impressed upon the PFRB a final vote was conducted with six members voting in favor of Calicott's reinstatement and two against it.

205. The "recommendation" for reinstatement came with 11 mandatory conditions, of which the following have not been redacted:

"1. Fr. Calicott must never be in the presence of a minor without another responsible adult present.

[...]

5. An on-site monitor is required to reside at the parish and report to the Professional Fitness Review Administrator.
6. Fr. Calicott's presence at the parish and his compliance with this agreement shall be monitored by the Professional Fitness Review Administrator, the local Episcopal Vicar, and the Vicar for Priests.
7. Fr. Calicott must live with at least one other adult, and this individual and their residence must be approved by the Professional Fitness Review Administrator.
8. The entire protocol of restrictions for Fr. Calicott will be announced to the adults of the Holy Angels parish and school so that they can assist in the monitoring.
9. The Archdiocese will provide training for the parish and school staff regarding their participation in the monitoring of Fr. Calicott.
10. Fr. Calicott, the on-site monitor, and the Professional Fitness Review Administrator will discuss in detail Fr. Calicott's Individual Specific Protocol which he will be expected to follow.
11. Fr. Calicott will submit any future requests to modify these restrictions to the Professional Fitness Review Board for consideration and recommendation from the Board to be sent to Cardinal Bernardin for his review and acceptance."

206. The PFRB also made several additional *suggestions* in the event that Calicott agreed to abide by the aforementioned conditions of reinstatement:

- "1. The PFRA and the Vicar for Priests will speak with J.C. about these protocol restrictions and to inform him that there are no exceptions to these restrictions.
2. The PFRA and the Vicar for Priests will interview and recommend an on-site monitor to the Cardinal.

3. The PFRA, on site-monitor (sic) and J.C. will meet to discuss the provisions regarding his Individual Specific Protocol.
4. The Archdiocese will ensure that J.C. in his Sunday sermons does not pronounce victory or convey any indications of racism.
5. [Redacted]
6. J.C.'s file will remain open for the remainder of his priesthood."

207. Although Calicott's attorney, Patrick Reardon, appears to have already been advised of the outcome of the PFRB's recommendation for reinstatement by August 15, 1995, a special meeting involving Calicott, Cardinal Bernardin, Tom Paprocki, Bishop Murry, Pat O'Malley, and the PFRB Administrator, Bernadette Connolly, was set for August 18, 1995, for the purpose of addressing the recommendation and the conditions attached thereto.

208. The Archdiocese clearly understood that in **"making these recommendations, the Review Board is clearly doing so as an exception to our policies and procedures."**

209. Because Cardinal Bernardin was unable to make the August 18, 1995, meeting (due to illness), Calicott did not hold back and was "indignant about the proposed conditions."

210. Additionally, the message to Calicott emphasized that he must "not use [his] return as an occasion to vent [his] anger at anyone involved in the this matter, such as the Review Board, the Archdiocese or the process itself."

211. After a hallway lecture from his attorney, Pat Reardon, it seems Calicott went through a volatile cycle of emotions that ended in tears, with the meeting concluding "with John [Calicott] and Pat Reardon saying they would need some time to discuss this between themselves and think about it."

212. Following the meeting, Bernadette Connolly recorded her "opinion that John Calicott is still very much in denial."

213. Somehow John Calicott honestly believed that he was entitled to be reinstated as pastor at Holy Angels without any conditions whatsoever.

214. John Calicott “accepted [the] offer for his return to Holy Angels” on August 25, 1995, though not without demanding an explanation from the PFRB for at least one of the [redacted] conditions imposed upon him.

215. On September 8, 1995, Calicott finally had a meeting with Cardinal Bernardin, along with Bishop Murry and Tom Paprocki, which Calicott primarily used as a forum to air his feigned indignation over his ISP, and also to request permission to return to the Holy Angels Rectory “ASAP.”

216. For his part, Cardinal Bernardin expressed his preference that Calicott’s reinstatement to Holy Angels “be done as quietly as possible.”

217. In the end, Calicott’s tactics worked, leading him to assert to Fr. Thomas Swade (during their overlapping stays at the Mundelein penalty box for child molesters) that “had [Swade] been more personally aggressive and had he organized the people of St. Dorothy he would be out of Koenig Hall by now.”

218. Calicott’s formal return to Holy Angels was choreographed with care and involved a number of symbolic formalities. First, Calicott would need to execute a confidential agreement co-signed by a “representative of the Archdiocese, Review Board and [redacted]”; as well as a public “Covenant” to be co-signed by the chairperson of Holy Angels’ Parish Pastoral Council as part of a liturgical demonstration during his “welcome back” mass.

219. A short, formal statement was also drafted for Cardinal Bernardin’s signature, which Bernardin only sought fit to modify in one respect: he wanted the italicized section of “After long deliberation and with the *advice* of the Archdiocesan Fitness Review Board I wish to inform

you that I am returning Father Calicott to active ministry as pastor of Holy Angels Parish” to be changed to “with the *concurrence and counsel* of” – because, after all, the PFRB “did vote 6 to 2 to let him go back”!

THE UNCHASTENED JOHN CALICOTT RETURNS TO HOLY ANGELS

220. Fr. Calicott’s return to Holy Angels “officially” took effect on October 15, 1995, although Calicott was apparently quite upset that “his return was postponed for one week,” requested permission to move back into the Holy Angels Rectory before that date and threatened the Archdiocese that they should “start preparing my exit package” unless it relented to his demands.

221. Calicott’s request to return to the Holy Angels Rectory before October 15, 1995, was denied by Tom Paprocki and Bernadette Connolley, but Calicott didn’t care – he still moved back in by October 12, 1995 (a “flat out” violation of his ISP), and “played off Bernadette [Connolley] v. [Bishop] Murry.”

222. The Archdiocese and the PFRB already understood that they needed to “keep a record” with respect to their dealings with Calicott.

223. To say that John Calicott’s first sermon back at Holy Angels on October 15, 1995, was not substantively in accord with Cardinal Bernardin’s specific instructions would be a gross understatement. Calicott deliberately incited anger against the Archdiocese, refused to acknowledge the truth of the allegations made against him, and demonstrated an overall “[p]rofound lack of gratitude” – in the words of Bishop Murry, who reported on the proceedings to the Archdiocese.

224. There was a great deal of often unfavorable media coverage over the Archdiocese's decision to reinstate Calicott, which the Archdiocese tracked closely, including by ordering a listing of television news mentions of the matter from Video Monitoring Services of America, Inc.

225. Sr. Helen was an ardent supporter, who commented: "My observations of the father is that he is an excellent example of Christian living [...] I think it's tremendous he is returning."

226. Not everyone felt similarly, however, including the parent of a Holy Angels preschooler who explained: "I don't think he should be allowed to come back. With those kind of accusations, he should not be allowed to be around kids."

227. Calicott was called to a meeting with Bernadette Connolly, Ray Goedert, George Murry, and Pat O'Malley on October 18, 1995, in order to address several issues that had already developed, including: (1) Calicott's violation of his ISP; (2) Calicott's use of his October 15, 1995, sermon to vent his anger (in defiance of Bernardin's request to the contrary); and (3) whether Holy Angels Parish could actually serve as an objective monitor of Fr. Calicott.

228. Calicott went through his familiar routine of arguing ambiguities in his ISP, blaming others, and ultimately breaking down in tears – and nothing tangible really came of the meeting or the review of that meeting by the PFRB on October 21, 1995. However, several members of the Board "expressed their concern about the way this case has been handled, especially the pressure put on the Board to return Father Calicott to the parish. They thought it was not fair that the Archdiocese's statement made it sound like the Cardinal responded to a recommendation from the Review Board when, in fact, it was the Cardinal who asked the Board to return Father Calicott to the parish."

229. In an audacious correspondence written to the Pope, John Paul II (with the Archbishop of every other major US archdiocese cc'd), on October 23, 1995, an unknown author warned, in relevant part:

“I am writing to you today to express my outrage, grave concern and utter disappointment with recent events which have taken place within the Archdiocese of Chicago. This disgrace, of which I speak, is the recent re-installation of Rev. John Calicott to his role as Pastor [...] Father Calicott, who won't fully admit to having abused children, is a sign of the sickness that is pervasive in the U.S. Church [...] To see a Prince of the Church re-install a reported child molester as a parish priest is nothing short of mortal sin. Rather than tending the flock, I believe that Cardinal Bernardin has not only left open the gate but as placed a wolf amongst the sheep.

I will not ask how the Church will respond when Fr. Calicott strikes again. At that time, any action will be too late. The Archdiocese has reportedly spent \$9 million on child abuse cases amongst clergy since 1991. Since 1980, a Washington newspaper reports that the American Church has spent \$500 million on child sexual abuse cases [...] American Catholics are tired of throwing away their dollars when their intended use (to assist in establishing the Kingdom of God) is being diverted to take care of clergy crimes. With the re-installation of Fr. Calicott, we will now potentially be facing a new problem – Church sanctioned crime. [...] We know deep in our hearts that we are risking the spiritual, emotional, and physical lives of our children by allowing [Fr. Calicott] to practice his ministry. I find it astounding that the Catholic Church can deny a woman a priestly vocation for reasons of her femaleness yet can advocate (which is exactly what we are doing in Chicago) the priestly vocations of a pedophile. I am sure, in light of this, Jesus weeps.

[...]

The moral path is clear if we follow our instincts. I ask you, as the Successor to Peter, to be bold enough and courageous enough to take action to save our children. As you actively and successfully stood up against the Russian threat to Poland, I believe that you also can and need to stand up and be heard against clergy-inflicted child abuse. I understand that one of your most cherished tasks is to re-establish the moral order in the United States as it has seriously declined over the past 20 years. As an American, I can tell you that you would gain enormous respect and the hearts of millions of both the faithful and those that have fallen away from the Church by making a statement on the abuse of children by the clergy and through removing Fr. Calicott from his parish priest role in the Archdiocese of Chicago.”

230. Though Bob Miller's transition out of Holy Angels appears to have been genuinely contemplated, on October 19, 1995 – less than a week after Calicott formally returned – he was

soliciting Pat O'Malley to move into the Holy Angels Rectory and to extend his stay "at Holy Angels longer than anyone (including myself!) expected."

231. Evidently Miller and Calicott had already "established a good working relationship," and it appears as though Miller's suggested extension at Holy Angels was specifically requested both by Calicott and George Murry.

232. By October 20, 1995, Miller was actively defending Calicott before the Priests' Placement Board by asserting that Calicott had been unfairly treated by the media reporting.



John Calicott (left) with Robert "Bob" Miller

233. By October 23, 1995, those at Holy Angels were already telling the Archdiocese that "they don't need 'training in monitoring,'" and reported that they were already getting training from Helen Strueder, an "internal consultant."

234. However, *that same day* an "anonymous caller from Holy Angels" reported to the Archdiocese that they had witnessed Calicott embracing children outside of the Rectory and leading one of those children alone to a locked location in the Church basement. This caller also reported that Holy Angels was insisting that parents sign corporal punishment "contracts" with the School, that "[a]ll teachers have paddles in hand" and that a preschool teacher had struck an entire class of about 30 preschoolers on their heads.

235. Sister Helen outrageously denied the use of corporal punishment generally and the use of paddles specifically.

236. Fr. James “Les” Mollohan – a retired priest who had previously served at Holy Angels and already had a good relationship with Calicott – was Calicott’s designated on-site monitor. On October 24, 1995, he was specifically asked about the incident involving the boy that Calicott had taken to a locked basement, with Les Mollohan explaining that Calicott’s whereabouts on that particular date may not have been logged. Mollahan also reported that Holy Angels School had suspended 23 students due to their parents’ failure to attend mass, and also that a 22-yo man who was “a good friend of” Calicott’s was staying at the Holy Angels Rectory.

237. True to form, when presented with the allegations on October 25, 1995, Fr. Calicott “stated that he was very angry and why should he have to respond to all of these allegations.” In a formal, written response the following day, Calicott reaffirmed his arrogant defiance as follows:

“If I leave or return to the rectory at anytime between 3:00 P.M. to 4:00 P.M. I will encounter some children who will come up to me and hug me, especially the younger ones. The children know me and love me. I will respond with a slight embrace or pat on the child’s (children’s) head(s). However, on the day in question, my calendar indicated that I was meeting with my two assistant Scoutmasters. Not only are they Scoutmasters, they are also friends, so my sense would be that the meeting went well beyond the 3:30 p.m. scheduled ending (virtually all such meetings with them do). I do not remember going to the church basement at all on this date but on the off chance, (sic) that I had left the meeting to do something in the church basement, I queried the after school care staff about whether I had been in the basement on that date of whether the doors to the church basement had been locked on that date. While they could not remember whether or not they had seen me in the church basement on that date, the doors of the church basement are not locked during the after school care. And there was after school care on Monday, October 16th. Thus there is considerable lack of understanding as to how or why this anonymous called was unable to get into the church basement.

I find it curious that this anonymous caller would call shortly after the very biased and misinformed Oprah Winfrey Show and related a supposedly week old and unconfirmed event in very much the same language of a participant on that show.

Finally, I would request, Bernadette, that you, the Professional Fitness Review Board Administrator, meet at your earliest convenience with me and my attorney, Mr. Patrick Reardon, to discuss both the extent and the rationale as to the anonymous letters and calls for which I must account.”

238. On October 31, 1995, a concerned Holy Angels parishioner (who also happened to be a delegate to the APC Executive Committee), advised the APC Executive Committee of various pertinent points: (1) that Holy Angels was more divided than ever; (2) that the Holy Angels Pastoral Council was not representative of the parish at large, and had been “‘stacked’ with Father Calicott’s people;” (3) it was not actual Holy Angels parishioners that vocally supported Calicott at his “Welcome Back” mass, “rather they came from other parishes;” and (4) that it was “unreasonable to think anyone can ‘control’ or ‘supervise’ Father [Calicott]. He was in the parish previously when he was not to have been there.”

239. On the same day, Calicott admitted to Bernadette Connolly that he assisted Bob Miller with the School and Church registration process at Holy Angels back in August of 1995 – yet another clear violation of his ISP.

240. Recognizing these immediate problems with Calicott, Pat O’Malley wrote to Cardinal Bernardin imploring him to meet with Calicott again to reassert the expectations: “My sense is that John needs to know as clearly as possible that, if this return to ministry at Holy Angels does not work out, for whatever reasons, you may be forced to withdraw him [...] While he has been told this repeatedly, he may not really think you would do it [...] John is the one person who can make this work. If he is not on board totally, then it’s bound to fail. He’s got to know that.”

241. Bernardin wrote to Calicott, in relevant part as follows: “It is absolutely essential that you comply with your protocol totally. This is the only thing left by which I can justify your staying on in the parish. If you compromise on the protocol in any way, the Board will recommend that you be moved from the parish and I will comply. *This would be disastrous, as I said, for you*

and for everyone, including myself. But that disaster will become a reality if the entire protocol is not observed.” (Emphasis added)

242. Calicott’s ISP and the monitoring regime implemented on paper seemingly did nothing to stop him from exploiting altar boys for sexual abuse, including casual genital fondling that Calicott performed openly and notoriously.

243. However, for more severe abuse, Calicott would tend to isolate his victims in his office behind that altar of the Church.

244. By February of 1996, enrollment at Holy Angels School was declining due to Calicott’s return, and this abandonment of the Parish by students and parishioners reflected a serious and obvious problem with regard to the effectiveness of the “parish monitoring” system.

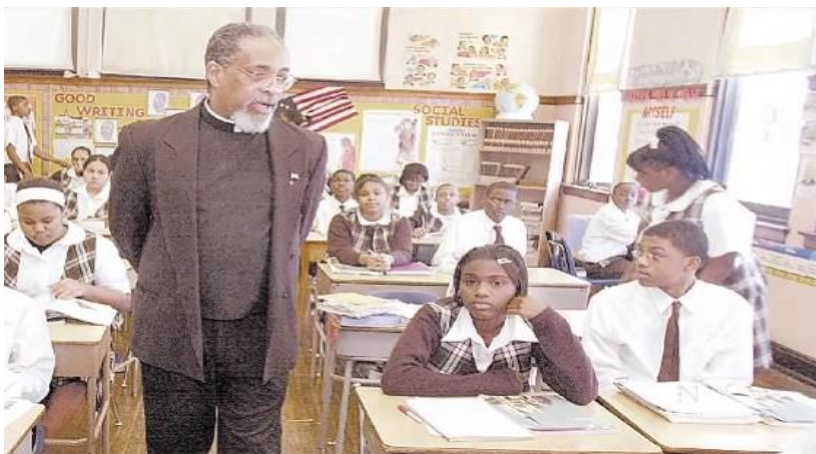
245. Of course, most of those who left Holy Angels did so because they were concerned about Calicott’s behavior, and were also the ones most likely to have scrutinized and reported his noncompliance with his ISP.

246. Unsurprisingly, those that remained were a distilled group of self-selected, diehard Calicott supporters – the ones who believed that the sexual abuse allegations were not true, that the protocol was unfair, that the Archdiocese was racist, and that Calicott deserved their protection. This dynamic was subsequently described by a member of the PFRB as follows:

“Outside this board, I happen to know a lot of people at Holy Angels. Most of those people don’t believe he did anything wrong. So I think there’s such immense denial over there that while I agree that this [monitoring protocol] is a good model and we can use it, I don’t think it fits in [Calicott’s] case. I’m not convinced that children are not in danger because people don’t believe over there, for the most part, that he did anything wrong, and they aren’t watching him. What they’re watching is to protect Fr. Calicott *from us*. They’re not watching to protect kids from Fr. Calicott. And I think that’s a very serious concern. They consider the whole monitoring a joke. They talk about it, oh so-and-so, but they’re not there. And there’s this, ‘Oh we’ll be careful if anybody asks if somebody was there.’”

247. In January of 1997, Les Mollohan had been relieved of his duties as Calicott's on-site monitor and he was replaced by Fr. Bob Miller, who was open about the fact that "I have a problem with this whole concept of zero tolerance" for child sex abuse.

248. In any event, there was a well-established understanding of the allocation of responsibility between Miller and Calicott, whereby Miller handled the Parish's administrative functions, while Calicott focused his attention on the youth. As Fr. Miller explained: "I run the parish, [Fr. Calicott] the school."



Fr. John Calicott

**THE FIX WAS IN
CALICOTT RENEWED FOR SECOND TERM**

249. In June of 1997 the PFRB was notified that Calicott was actively violating his ISP, very probably because he had unilaterally discontinued some form of mandatory therapy or counseling.

250. The PFRB's impotent response was to "[i]nform Fr. Thomas J. Paprocki about the violation of protocol and ask that the Archbishop be made aware of this violation through a verbal conversation." *And*, if Calicott failed to provide a written statement explaining why he did not

inform the PFRB of his anticipatory breach of his ISP, then “further action would be taken in terms of informing the Archbishop in writing of the violations noted.”

251. Fr. Calicott basically admitted that he knew that he had violated the protocol and should have disclosed it to the PFRB, for which “I must apologize.” However, Calicott mostly used the opportunity to request further easing of his ISP, before closing with: “The deep, pervasive injury which I brought into the lives of others occurred over twenty years ago. It has and does occasion a sorrow I will carry with me to my grave. Above and beyond my own personal knowledge, I feel that time has borne out the fact that there has been no recurrence.”

252. Given that the standard term of appointment for a pastor was six years, and Father Calicott was officially appointed to Holy Angels effective October 27, 1991, under normal circumstances that would mean that Calicott would be subject to an evaluation before a 6-year renewal would be considered. However, Cardinal Francis George – the Archbishop of Chicago as of May 7, 1997, succeeding Cardinal Bernardin – determined that before the evaluation would be initiated he first needed a renewal recommendation directly from the PFRB. Pending that recommendation, however, Fr. Calicott would remain head pastor of Holy Angels – seemingly indefinitely.

253. It was in this context that the PFRB asserted its leverage over Calicott with regard to his unilateral decision to discontinue an element of his ISP, the early report of Calicott locking himself away with a minor in the Holy Angels Church basement, and evidently some additional “red flags” that led the PFRB to be “concerned that children may be at risk.”

254. The PFRB wielded this formidable power by demanding that Calicott provide something [redacted] *or else* “the Board would have serious reservations about recommending that Father Calicott be given a second term.”

255. Whatever it was that the PFRB sought from him, Calicott refused to provide it.

256. On January 24, 1998, the “Review Board discussed this matter for several hours. Based on the limited information received and Fr. Calicott’s refusal to [redacted], the Board concluded this raised new questions about whether children are at risk at this time. Therefore, the Review Board could not make a recommendation regarding Fr. Calicott’s second term as pastor or his continuation in ministry.”

257. Cardinal George wrote back to the PFRB acknowledging its indecision and further informed the Board that he would personally meet with Calicott to secure the information that the PFRB was seeking, at which point “I will expect a recommendation from the Review Board about whether Father Calicott’s appointment to a second term as pastor or his continuation in ministry would present a risk to children.”

258. Tom Paprocki drafted a memorandum for Cardinal George in contemplation of this meeting that was elementary and detailed in a manner that suggests that Cardinal George had virtually no prior familiarity with Fr. Calicott or his history.

259. Paprocki thereafter succinctly explained: “The purpose of [the] meeting with John is [redacted] to answer the Review Board’s questions. Without the answers to these questions, the Board cannot make a recommendation about risk to children, and without the Board’s positive recommendation, *you cannot in conscience appoint him to another term or even allow him to remain in ministry that has access to minors.*”

260. Ultimately, after months of multilateral negotiations involving Calicott, his attorney (Pat Reardon), Cardinal George, and the PFRB, around April 18, 1998, it was agreed that Calicott would release a questionnaire answered by some [redacted] individual, while also redacting the

names of other individuals identified therein, along with written commentary by Calicott regarding some of the answers.

261. Around this time the PFRB also got wind of a “rumor” that Fr. Calicott had been seen alone with Boy Scouts without adult supervision.

262. The fact of the matter is, given the heightened risk involved in isolating himself with children during school hours, and his own experience of being reported for doing so, following his reinstatement Calicott seems to have leaned more heavily on his access to Boy Scouts to satisfy his depraved sexual appetite. For one victim, the abuse was casual, regular, and committed with little discretion. For another victim, the abuse would occur opportunistically in a secluded area.

263. For some, Calicott would employ a ruse in order to fondle their genitals, such as by providing an unsolicited lesson on the appropriate technique for shaking off a penis after urinating.

264. Calicott would also commit abuse on camping trips, where Scouts were known to share cautionary remarks with one another about whether Calicott had “gotten to you yet.”

265. Calicott “got to” one victim at night when Calicott entered his tent and directed the victim to join him in his sleeping bag for warmth, which ultimately led to genital fondling.

266. Although Calicott remained its leading organizer and *de facto* Scoutmaster, it seems that Fr. Calicott asked his ardent supporter and supposed monitor, Fr. Bob Miller, to be the officially registered “Executive Director” of the Troop, while Calicott does not appear to have been formally associated with the Troop in any manner.

267. And while Miller admitted that Calicott was still assisting with the Scouts, continued to go on trips with the Scouts, and that the weekly Scout meetings were in the “open visibility” of the Rectory on Friday nights, he nonetheless swore “on a stack of bibles that JC has

never been alone with the scouts.” Miller followed that up the next day by suggesting that the “rumor” likely came from the envious Scoutmaster of another troop.

268. At its meeting on May 16, 1998, the PFRB “was split in its decision regarding whether Fr. Calicott is a risk to children,” with four members feeling that “Fr. Calicott posed a significant risk to children [...] and is unsuited for Parish Ministry,” and the other four members feeling that Calicott did not pose a *significant* risk to children *at that time*.

269. Thus, “[t]he Board could not reach a consensus regarding Fr. Calicott’s eligibility for a second term as pastor of Holy Angels Parish and his continuation in parish ministry.”

270. The tie went in Calicott’s favor. Cardinal George dispatched the Archdiocese’s Vicars for Priests, Fr. Daniel Coughlin and Fr. Lawrence “Larry” McBrady, to meet with Calicott and address the PFRB’s concerns *unrelated to his risk to children*, including Calicott’s impulsivity and rage, his alcohol consumption, and his possession of a firearm.

271. Cardinal George “was satisfied with their report and will now proceed with further steps in the ministerial evaluation of Father Calicott’s pastorate before reappointing him to another term as pastor.”

272. The writing was on the wall at this point, and the PFRB humbly offered Cardinal George a revised ISP for Calicott, which Cardinal George subsequently modified at Calicott’s request and deliberately without reconsideration or approval by the PFRB.

273. Fr. Calicott’s “first term pastor review” was finally initiated in September of 1998, and the fix was in for this too.

274. As a consequence of an absolutely farcical selection process, the two priests designated to perform the review were overt Calicott supporters. What’s more, their only real function was to distribute questionnaires to “twelve to fifteen lay leaders and representative

parishioners” and 13-15 members of Calicott’s staff – who would be selected *by Calicott* – and then summarize the responses in a report to the Archdiocese.

275. The final review report was submitted on September 8, 1999, and it was clearly and predictably drafted with the intention of supporting Calicott’s renewal as well as his pending request to the PFRB to remove his monitoring conditions.

276. That report’s high praise notwithstanding, the PFRB did not recommend discontinuation of Calicott’s on-site monitoring, although the Diocesan Priests’ Placement Board and Cardinal George did ultimately approve Calicott’s “reappointment” at Holy Angels.

277. Shortly thereafter, Fr. Bob Miller wrote the new Administrator of the PFRB, Kathleen Leggdas, an indignant letter summarizing his views on his responsibilities as Calicott’s monitor:

“First, I consider the process Fr. Calicott went through a real travesty of justice and insensitivity. After being here at Holy Angels nearly 5 years now, I feel the very fact that monitoring continues on at all (or even began in the first place) in this case is a sad statement on how heavy-handed and unadaptable this Archdiocesan process is [...] Fr. Calicott is one of the most remarkably gifted, pastorally wise and prudent people I have ever met in my 23 years of priesthood. There has never been the remotest shadow, nor even hint of any shred of a shadow, of suspicion in action, word, gesture or speech either private or public. This entire process against him should be ceased and halted and resolved immediately. In the interim, I will file the required monthly forms – but only because it is part of the legal gymnastics required to allow this remarkable man to continue ministry here.

Secondly, part of this previous agreement that [Bernadette Connolly] had agreed to was the monthly payment of \$300 for my services in rendering these reports. I will continue this monthly monitoring as long as I am reimbursed for these efforts. Now, lest that sound like crass materialism and selfishness, allow me to say that all monies I receive are turned over immediately to Holy Angels Church to further the inner-city work this deficit parish struggles with daily. One of the few motivating reasons for me to continue to justify the monitoring is that the parish can benefit financially.”

278. Rather than replace, or even reprimand, Fr. Miller for his brazen display of hostility towards his voluntarily accepted role as Calicott's monitor, the Archdiocese responded in the only manner in which it felt appropriate: it paid Miller the \$300/mo.

279. Although Miller resumed submitting his monthly monitor reports in the spring of 2000, by summer Father Calicott was again in violation of his ISP, this time for failure to submit his daily logs and reports of his internet history.

280. In petulant fashion, Calicott also refused to sign off on Miller's monitoring reports, ostensibly out of principle: "Bob is being paid to spy on me. I'm not being paid to spy on him. I do not know how I can speak to what he does or does not see."

281. Despite whatever might have been contained in Fr. Miller's monthly monitoring reports, it is evident that Fr. Calicott was frequently able to and did isolate himself with young boys in order to sexually molest them on a continuous basis during the entirety of his tenure at Holy Angels.

282. On January 6, 2002, the *Boston Globe* published its first of a lengthy series of exposés regarding child sex abuse committed by Catholic priests and the efforts of Church authorities to protect the priests and silence victims. The magnitude of the ensuing scandal and media attention was unprecedented and finally served as the primary catalyst for uniform, nationwide reform.

283. At a closely followed meeting of the U.S. Conference of Catholic Bishops ("USCCB") in Dallas held in June of 2002 Bishop Wilton Gregory led the charge to secure approval of the "Charter for the Protection of Children & Young People" (informally known as the "Dallas Charter") which included a number of notable precepts, many of which were already substantially in place within the Archdiocese of Chicago – at least on paper – as a consequence of

Cardinal Bernardin's establishment of policies and procedures concerning child sexual abuse in 1992. However, a few distinctive measures were new and controversial, in that the Dallas Charter required that:

- (1) Dioceses must report allegations of abuse to and cooperate with civil authorities;
- (2) Even a single act of substantiated sexual abuse of a minor would require that the priest be removed from *all* ministry – not merely *parish* ministry; and
- (3) “In every case” the accused priest was to be adjudicated through the Catholic Church's internal, canonical process.

284. It was, however, the second principle – the “one-strike” policy, which essentially barred credibly accused priests from ministry – that proved to be most controversial.

285. The bishops at the conference were almost evenly divided on the Dallas Charter initially, but under pressure stemming from the *Boston Globe* reporting and ensuing public outcry the USCCB ultimately endorsed it by a lopsided 239-13 vote.

286. Although the Dallas Charter was brief and in some ways ambiguous, Cardinal George clearly understood the implications for certain priests in the Archdiocese of Chicago, including John Calicott, who Cardinal George personally called promptly after the final vote on June 14, 2002.

287. On June 24, 2002, Cardinal George signed the decree adopting and incorporating the “Dallas Protocols” as official Archdiocesan policy.

288. On June 25, 2002, Fr. Calicott was formally advised in writing that he was being withdrawn from Holy Angels, effective immediately, and would be sent back to Koenig Hall in Mundelein.

289. Calicott resisted, but for this particular battle he elected to change tack: rather than obscure his admission of guilt, Calicott openly took responsibility (this would not last) and pleaded for sympathy and Christian charity. He even went so far as to claim that he (John Calicott) had been sexually victimized by a priest in his youth. He also implied to the press that his parishioners would rebel, he encouraged a letter writing campaign, and initially refused to leave Holy Angels as ordered.

290. In Bob Miller's sermon to the Parish the following Sunday, June 30, 2002, he elaborated on his outrage at the new "Dallas document" and referred to Calicott as "a sacrificial lamb being led to the slaughter."

291. In contradiction to everything the Archdiocese knew to be true about Calicott and his history of child molestation, Miller stated:

"Far more importantly – the blunt bottom line is that **John has done nothing to warrant this unjust treatment.** I have been Fr. John's 'monitor' for 6 years, and I personally know all the facts of his situation. Fr. John has not been able to speak freely or openly about what specifically happened because of confidentiality issues. He knows things from confidential confessional conversations that cannot be revealed publicly because of his priestly commitment to God! So I want to say clearly to all Holy Angels membership – Fr. John Calicott has committed no sexual misconduct, no act of any sexual abuse, no act of molestation, is not a risk to children anywhere or anytime, is not a pedophile or ephebophile or abuser or ANY WORD you want to use for sexual impropriety! Fr. John is a man of absolute integrity and immense faith! He is a model of Christian kindness and priestly dedication."

292. In a further act of brazen defiance, Fr. Miller exclaimed: "as long as I remain Administrator at Holy Angels, no matter what any Dallas document says, no matter what any Cardinal says, John will be free to minister here however he wants or chooses."

293. As of July 9, 2002, Calicott was still residing at Holy Angels, leading one Archdiocesan official to lament: "I am at a loss to understand why Father Calicott is allowed to

remain at Holy Angels Parish [...] I am astounded by our collective inability or unwillingness to implement this explicit direction given to us by Cardinal George last week.”

294. This outright disobedience was framed as legitimate by a dubious and complex canonical legal theory as to Calicott’s right to effectively stay Cardinal George’s orders to leave Holy Angels by engaging in a series of direct appeals to the Pope. After a few weeks, however, Calicott at least agreed to start spending some nights and eat some meals in Mundelein.

295. Calicott and his most devoted supporters attempted to renew a pressure campaign against the Archbishop to make an exception to its policy, but the Parish outcry most certainly did not match that of Calicott’s original withdrawal.

296. The media was closely following the story, Cardinal George stood by (where Bernardin did not) his commitment to the principle that credibly accused priests could not minister, and so the writing was on the wall for all but the most blindly loyal or culpable Calicott supporters.

297. The remainder of John Calicott’s long, sordid, and pathetic history does not merit much further attention, but a worthy synopsis would go something like this:

298. After “leaving” the Parish, Calicott pursued every conceivable right to appeal over a period of several years, but lost at every turn.

299. Along the way he began planning for life after laicization, including with a personal website promoting some wellness products (the “most lucrative RISK FREE business in America”) that had many hallmarks of being an undeveloped multi-level marketing scheme.

300. Calicott frequently violated his ISP – by preaching at a funeral, refusing to maintain daily logs, and returning to Holy Angels on a regular basis – most probably with little risk under the oversight of the designated Mundelein monitor, Fr. Anthony Talarico, whose poor performance caused “great concern” amongst the PFRB.

301. Despite the monitoring, the daily logs, and the widely understood (amongst Holy Angels parishioners) orders from Cardinal George that he could not be present on Holy Angels' property, it required a local NBC journalist to point out publicly that Calicott had not only been maintaining an active presence at Holy Angels, but was openly permitted to teach lessons to school children on topics including sex education.

302. Several of his victims have independently reported that they were subjected to such lessons and specifically recall Calicott demonstrating how to apply a condom to a banana.

303. As the Archdiocese later learned, Calicott had been visiting Holy Angels almost every day, spent most nights in the Holy Angels Rectory, and was actively "mentoring" various young men.

304. The Survivor's Network of those Abused by Priests (SNAP) immediately blasted the airwaves with condemnation of the Archdiocese for failure to enforce its own policies pertaining to Calicott, and Cardinal George issued a decree clarifying that Calicott was not permitted to be *anywhere* within the canonical territorial boundaries of Holy Angels Parish.

305. Fr. Anthony Talarico was also finally removed from his ostensible position as Calicott's monitor in Mundelein.

306. Father Calicott continued to be present at Holy Angels and led the Boy Scout Troop with the knowledge, consent, and active concealment of Fr. Bob Miller, and refused to complete his daily logs, as required by his ISP.

307. "Everyone" at Holy Angels was aware of Calicott's "highly visible" presence, specifically including two secretaries stationed at the Holy Angels Rectory, a retired policeman that worked with the Scouts, the regional Director of the Boy Scouts, and all of the nuns living across the street who could clearly see Calicott's car parked at the Rectory.

308. Cardinal George threatened, and apparently ordered, a series of salary reductions (10%, 20%, then 50%) to Calicott as a consequence of his disobedience, but the 50% reduction somehow “slipped through the cracks” and was never actually implemented.

309. On March 7, 2006, a report commissioned by the Archdiocese was issued on the effectiveness of the monitoring system applied to priests accused of child sexual abuse. The conclusions were stark:

“An effective monitoring system geared toward reducing the further sexual victimization perpetrated by accused priest abusers does not exist. Instead, there exists an ‘honor system’ wherein the accused priest abusers are presumed to be truthful, live in relative anonymity in unrestricted environments, enjoy unlimited and unrestricted movement, and suffer little if any consequences for failing to comply with Archdiocesan monitoring protocols.

The monitoring system that is currently being done is based exclusively upon the self-reported activities of the accused priest abusers. There are few attempts to corroborate or verify any information provided by the abusers [... Meanwhile the] monitors are all clergy or religious – three priests, two nuns and one deacon. None of the monitors have received any type of training relative to sex offender management procedures, sex offender identification, or sex offender treatment or supervision.”

310. For those, like Calicott, who were formally residing at the Cardinal Stritch Retreat House at St. Mary of the Lake, it was noted that the “accused priest abusers have unrestricted movement, and are not mandated to be present at the retreat house for any particular time. Although the monitor believes that most of them are in the facility at night, there is no effort to verify their presence. In addition, no procedures exist requiring the accused priest abusers to sign in or out of the facility. They may or may not be present in the residence at any given time.”

311. It took until September 18, 2009, for Calicott to fully exhaust all of his rights to appeal, which confirmed the finding that Calicott was guilty of sexual abuse and the penalty of “dismissal from the clerical state” which became immediately effective.

312. Calicott was required to take an “Oath of Secrecy” and execute an “Agreement of Confidentiality” in order to review the final decision, which despite terminating “all the rights of the clerical state,” preposterously did *not* include “a dispensation from celibacy.”

313. John Calicott died on May 14, 2024.

COUNT 1
(NEGLIGENCE)

314. Plaintiff, JOHN DOE 61, hereby incorporates by reference paragraphs 1 through 313 as if fully stated herein.

315. JOHN DOE 61, a male born after July 23, 1983, and a resident of Illinois, attended Holy Angels School for several years in the 1990s and early 2000s.

316. JOHN DOE 61 was involved in the Boy Scouts and played sports at Holy Angels.

317. The Archdiocese knew that it had exercised negligently and wantonly deficient supervision, evaluation, and control of Holy Angels Parish, Holy Angels School, and its personnel, including Fr. John Calicott, prior to the time that Fr. John Calicott committed the acts of sexual battery against JOHN DOE 61 as described herein.

318. The Archdiocese knew and reasonably should have known of Fr. John Calicott’s propensity and risk of committing acts of sexual exploitation against minors, including students at Holy Angels School, prior to the time that Fr. John Calicott committed the acts of sexual battery against JOHN DOE 61 as described herein.

319. Around the time when JOHN DOE 61 was in the 5th or 6th grade at Holy Angels School, he would attend Boy Scout meetings led by Fr. John Calicott at Holy Angels Church or the Rectory, which most typically occurred on Saturdays.

320. During some of these Boy Scout meetings JOHN DOE 61 would misbehave and Fr. John Calicott would direct JOHN DOE 61 to come to the Rectory afterwards with the mutual

expectation of a disciplinary encounter. JOHN DOE 61 would wait outside Fr. Calicott's room with usually three to four other boys until Fr. Calicott called him into the room so the two of them were alone. Once they were alone, Fr. Calicott would fondle JOHN DOE 61's genitals both over and under his clothes. This would occur on an almost weekly basis, and Fr. Calicott told JOHN DOE 61 not to tell anyone and that he would protect him from getting in trouble.

321. Fr. John Calicott escalated the abuse, forcing JOHN DOE 61 to perform oral sex on him over twenty times, before ultimately anally penetrating JOHN DOE 61 on several occasions.

322. JOHN DOE 61 was under the age of 17 at all times when he was subjected to abuse by Fr. John Calicott.

323. At all relevant times, the Archdiocese, by and through its agents, servants, and employees, knew and should have known of Fr. John Calicott's dangerous and exploitative propensity for committing acts of sexual misconduct against minors.

324. At all times relevant herein, the Archdiocese:

- a. Determined and controlled the parish/school assignment of Catholic priests within its operational jurisdiction, including Fr. John Calicott;
- b. Had direct and supreme authority and control over the position and/or role that Catholic priests, including Fr. John Calicott, had within the Archdiocese's operational jurisdiction; and
- c. Had the direct and supreme authority to terminate the employment of Catholic priests, including Fr. John Calicott.

325. At all times relevant herein, the Archdiocese permitted Fr. John Calicott to be appointed as and remain a priest at Holy Angels without any meaningful supervision, evaluation, or oversight, despite the Archdiocese's knowledge and reasonable suspicion that Fr. John Calicott posed a danger to students.

326. At all times relevant herein, the Archdiocese owed JOHN DOE 61 a duty to:

- a. Credibly investigate reports of malfeasance by priests granted diocesan faculties and assigned to parish ministry, including reports of sexual misconduct, harboring children in parish residence, and illegal adoption;
- b. Report priests assigned to parish ministry, including Fr. John Calicott, to civil authorities upon learning that they had engaged in sexual misconduct with minors or illegal adoption;
- c. Supervise and meaningfully evaluate its employees and priests granted diocesan faculties and assigned to parish ministry, including Fr. John Calicott;
- d. Supervise and meaningfully evaluate its parish facilities, including Holy Angels Church, Holy Angels School, and the Holy Angels Rectory;
- e. Exercise reasonable care so as to control priests assigned to parish ministry, including Fr. John Calicott, even while acting outside of the scope of their employment so as to prevent them from intentionally harming others while upon premises, including Holy Angels Parish facilities, in the Archdiocese's possession or to which said priests are only privileged to enter as priests granted diocesan faculties and assigned to that specific parish ministry;
- f. Terminate the employment of its priests assigned to parish ministry, including Fr. John Calicott, known or reasonably suspected to pose a danger of sexual exploitation of minors, including JOHN DOE 61; and
- g. Warn Holy Angels parishioners, students, and their families, of its knowledge and/or reasonable suspicion that Fr. John Calicott posed a risk of sexually exploiting minors.

327. At all times relevant herein, the Archdiocese breached its duties to JOHN DOE 61 by committing one or more of the following acts and/or omissions with utter indifference to or conscious disregard for the safety of Holy Angels students and parishioners:

- h. Failure to create, adopt, and/or implement adequate policies and/or procedures to prevent Fr. John Calicott from having access to children and/or adolescents;
- i. Failure to remove Fr. John Calicott from parish ministry, school administration, or from work that would permit him to access minors;
- j. Failure to alert the faculty/staff at Holy Angels Parish and Holy Angels School that Fr. John Calicott should not be alone with minors and/or requiring the faculty/staff to report instances where Fr. John Calicott was alone with a minor;

- k. Failure to recognize and/or adequately act upon the predatory and sexually exploitative tendencies of Fr. John Calicott while he was in the Archdiocese's service and employ;
- l. Failure to adequately investigate reports of malfeasance, including sexual misconduct with children, harboring children on parish property, and illegal adoption by Fr. John Calicott while he was a priest assigned to parish ministry within the Archdiocese;
- m. Failure to exercise any supervision of its priests and parish facilities, specifically including Fr. John Calicott, Holy Angels Church, Holy Angels School, and the Holy Angels Rectory;
- n. Failure to meaningfully review or evaluate Fr. John Calicott during his tenure at Holy Angels;
- o. Failure to exercise adequate care or implement any adequate intervention so as to control Fr. John Calicott, even while acting outside of the scope of his employment, so as to prevent him from intentionally harming others while upon Holy Angels premises;
- p. Failure to report allegations of sexual misconduct involving Fr. John Calicott and minor(s) to governmental law enforcement;
- q. Failure to warn the public, including JOHN DOE 61 and his family, that Fr. John Calicott had engaged in sexual misconduct with minors and was a danger to others;
- r. Allowed Fr. John Calicott to have unsupervised contact with JOHN DOE 61, a minor, by which Fr. John Calicott was able to sexually abuse JOHN DOE 61; or
- s. Was otherwise careless or negligent.

328. At all times relevant herein, it was foreseeable to the Archdiocese that sexual exploitation could occur in school, parish, and extra-curricular programs that provided Catholic priests, including Fr. John Calicott, with unsupervised access to children and/or adolescents.

329. At all times relevant herein, the Archdiocese knew and should have known that Fr. John Calicott's position as a priest at Holy Angels involved direct and unsupervised access to children and/or adolescents.

330. As a direct and proximate result of the Archdiocese's intentional, reckless, willful and wanton, and negligent acts and/or omissions, JOHN DOE 61 suffered and will continue to suffer great physical pain as well as great pain of mind and body, severe and permanent emotional, psychological, and spiritual distress and injuries, embarrassment, loss of self-esteem, humiliation, lost wages, and other injuries or damages.

WHEREFORE, the Plaintiff, JOHN DOE 61, prays for judgment against the Defendant, CATHOLIC BISHOP OF CHICAGO, a corporation sole a/k/a THE ROMAN CATHOLIC ARCHDIOCESE OF CHICAGO, in an amount substantially in excess of fifty-thousand dollars (\$50,000.00), plus costs, disbursements, interest, and such other and further relief as is deemed just and equitable.

COUNT 2

(VOLUNTARY UNDERTAKING AND PREMISES LIABILITY)

331. Plaintiff, JOHN DOE 61, hereby incorporates by reference paragraphs 1 through 330 as if fully stated herein.

332. The Archdiocese, through its own policies and procedures, and by permitting and/or encouraging its priests, including Fr. John Calicott, to serve in a position of authority over minors within Holy Angels Parish and Holy Angels School and to have unsupervised contact with minors on the Archdiocese's premises, voluntarily undertook and assumed the duty to provide a safe environment for minors without parental supervision; establish a security, investigation, and prosecution program; to deter sexually exploitative misconduct by priests, including Fr. John Calicott; and to protect parishioners, students, and others in the community, including JOHN DOE 61, from harm by sexually deviant priests who were in service to the Archdiocese.

333. The Archdiocese failed to exercise reasonable care in carrying out this voluntary undertaking, and the failure to exercise reasonable care increased the risk of harm to minors, including JOHN DOE 61, from predatory and sexually exploitative priests under its discretion and control, including Fr. John Calicott.

334. The Archdiocese had a special relationship with JOHN DOE 61, in that the Archdiocese of Chicago acted as voluntary custodian of JOHN DOE 61 as protectee.

335. The Archdiocese also owed a duty of care to JOHN DOE 61 under the Restatement (Second) of Torts § 314A(3), (4), and § 320, as the Archdiocese held its premises out to the public as a sanctuary and safe place for minors to visit, study, and stay without parental supervision and held out its priests, including Fr. John Calicott, as safe and trustworthy guardians of minors within Holy Angels Parish and Holy Angels School.

336. JOHN DOE 61 and his parents relied on the Archdiocese's holding out of Holy Angels Parish as a safe environment and its priests as trustworthy, honorable, and celibate, and forwent other protective measures and alternative options for education and religious engagement.

337. At all times relevant herein, the Archdiocese breached its duties to JOHN DOE 61 by committing one or more of the following acts and/or omissions:

- t. Failure to create, adopt, and/or implement adequate policies and/or procedures to prevent Fr. John Calicott from having access to children and/or adolescents;
- u. Failure to remove Fr. John Calicott from parish ministry, school administration, or from work that would permit them to access minors;
- v. Failure to alert the faculty/staff at Holy Angels Parish and Holy Angels School that Fr. John Calicott should not be alone with minors and/or requiring the faculty/staff to report instances where Fr. John Calicott was alone with a minor;
- w. Failure to recognize and/or adequately act upon the predatory and sexually exploitative tendencies of Fr. John Calicott while they were in the Archdiocese's service and employ;

- x. Failure to adequately investigate reports of malfeasance, including sexual misconduct with children, harboring children on parish property, and illegal adoption by Fr. John Calicott while he was a priest assigned to parish ministry within the Archdiocese;
- y. Failure to exercise any supervision of its priests and parish facilities, including Fr. John Calicott, Holy Angels Church, Holy Angels School, and the Holy Angels Rectory;
- z. Failure to meaningfully review or evaluate Fr. John Calicott during his tenure at Holy Angels;
- aa. Failure to exercise adequate care or implement any adequate intervention so as to control Fr. John Calicott, even while acting outside of the scope of their employment, so as to prevent them from intentionally harming others while upon Holy Angels premises;
- bb. Failure to report allegations of sexual misconduct involving Fr. John Calicott and minor(s) to governmental law enforcement;
- cc. Failure to warn the public, including JOHN DOE 61 and his family, that Fr. John Calicott had engaged in sexual misconduct with minors and was a danger to others;
- dd. Allowed Fr. John Calicott to have unsupervised contact with JOHN DOE 61, a minor, by which Fr. John Calicott was able to sexually abuse JOHN DOE 61; or
- ee. Was otherwise careless or negligent.
- ff. Failed to remedy a known dangerous condition on its premises by failing to supervise or in any other respects protect young children from a known sexual predator.

338. As a direct and proximate result of the Archdiocese's intentional, reckless, and negligent acts and/or omissions, JOHN DOE 61 suffered and will continue to suffer great pain of mind and body, severe and permanent emotional, psychological, and spiritual distress and injuries, embarrassment, loss of self-esteem, humiliation, lost wages, and other injuries and damages.

WHEREFORE, the Plaintiff, JOHN DOE 61, prays for judgment against the Defendant, the CATHOLIC BISHOP OF CHICAGO, a corporation sole a/k/a THE ROMAN CATHOLIC

ARCHDIOCESE OF CHICAGO, in an amount substantially in excess of fifty-thousand dollars (\$50,000.00), plus costs, disbursements, interest, and such other and further relief as is deemed just and equitable.

COUNT 3

(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)

339. Plaintiff, JOHN DOE 61, hereby incorporates by reference paragraphs 1 through 338 as if fully stated herein.

340. As described herein, the Archdiocese's conduct in, amongst other things: (a) holding Fr. John Calicott, known or suspected child molesters, out to the community as priests in good standing and placing them in positions where they had unsupervised access to minors; (b) deliberately and completely failing to exercise any degree of supervision, evaluation, and intervention with respect to Fr. John Calicott, Holy Angels Parish, and Holy Angels School; (c) failing to engage in reasonable inquiries or investigations in response to reports of Fr. John Calicott's reprehensible and illegal behavior; (d) actively concealing information pertaining to Fr. John Calicott's predatory and sexually exploitative tendencies and risks; (e) facilitating sexual abuse of minors by its active concealment; and/or (f) knowingly exposing minors to sexual abuse or the unreasonably high probability of abuse, was extreme and outrageous.

341. At all times relevant herein, the Archdiocese was aware and should have been aware that its conduct created an unacceptably high probability of minors at Holy Angels Parish and Holy Angels School being sexually abused by Fr. John Calicott.

342. At all times relevant herein, the Archdiocese was aware that sexual abuse of a minor is likely to cause severe emotional distress upon the victim.

343. At all times relevant herein, the Archdiocese knew and suspected that reasonable supervision, evaluation, investigation, or inquiry would have revealed compelling evidence of Fr. John Calicott's reprehensible and illegal behavior, including sexual misconduct with children, surreptitiously harboring children on parish property, and illegal adoption.

344. At all times relevant herein, the Archdiocese intentionally and/or recklessly disregarded the high probability that its conduct would result in the infliction of severe emotional distress upon JOHN DOE 61.

345. At all times relevant herein, the Archdiocese's conduct did and continues to cause JOHN DOE 61 severe emotional distress and mental anguish.

346. As a direct and proximate result of the Archdiocese's intentional, reckless, and negligent acts and/or omissions, JOHN DOE 61 suffered and will continue to suffer great pain of mind and body, severe and permanent emotional, psychological, and spiritual distress and injuries, embarrassment, loss of self-esteem, humiliation, lost wages, and other injuries and damages.

WHEREFORE, the Plaintiff, JOHN DOE 61, prays for judgment against the Defendant, the CATHOLIC BISHOP OF CHICAGO, a corporation sole a/k/a THE ROMAN CATHOLIC ARCHDIOCESE OF CHICAGO, in an amount substantially in excess of fifty-thousand dollars (\$50,000.00), plus costs, disbursements, interest, and such other and further relief as is deemed just and equitable.

Respectfully Submitted,

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

JOHN DOE 61,)
)
Plaintiff,)
) No.
-vs-)
)
CATHOLIC BISHOP OF CHICAGO,)
A corporation sole, a/k/a the ROMAN)
CATHOLIC ARCHDIOCESE OF)
CHICAGO CATHOLIC BISHOP OF)
CHICAGO,)
)
Defendants.)

RULE 222(b) AFFIDAVIT OF DAMAGES

The undersigned verifies, pursuant to Rule 222(b), that the total damages sought by Plaintiff exceeds \$50,000.00.

Dated: October 12, 2026

HART MCLAUGHLIN & ELDRIDGE, LLC

/s/ Sean O'Malley

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